

I-5

TXD 02648152

9/15/89

Mr. Daniel J. Eden, Director
Hazardous and Solid Waste Division
Texas Water Commission
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Dear Mr. Eden:

This is in response to your September 6, 1989, letter advising the Environmental Protection Agency (EPA) that an alternate schedule is necessary for GATX Terminals Corporation. The justification "includes, but is not limited to, the fact that the current caseload exceeds the Texas Water Commission's (TWC) resources."

GATX Terminals Corp. (TXD026481523) - The alternate schedule date established by TWC is October 31, 1989. This adds an additional 30 days to issue formal enforcement. EPA concurs with TWC's action.

If you have any questions on this matter, please call me, or your staff may contact Ms. Katy Griffith, Texas Oversight Coordinator, at (214) 655-6765.

Sincerely yours,

Allyn M. Davis
Director
Hazardous Waste Management Division (6H)

cc: Mr. Russell Kimble, Chief
Hazardous and Solid Wastes
Enforcement Section

bcc: Sam Coleman (6H-CT)

6H-HO:KGR:KGFITH:kg:x6765:9/13/89

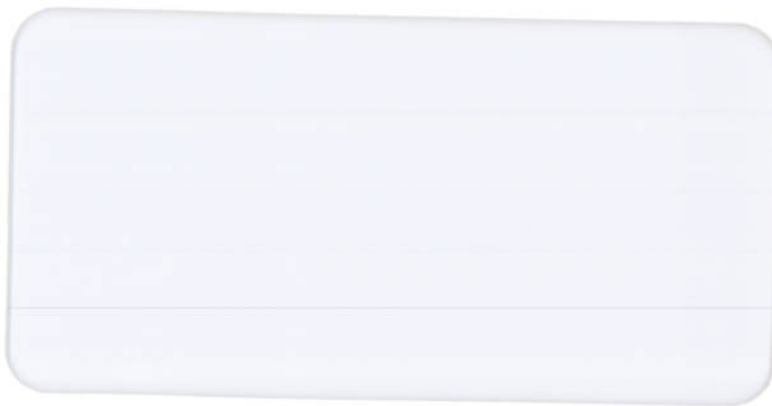
Control 6H-562-89

THOMPSON BROWN GERSH
6H-HO 6H 6H

for
9/15/89
9/15/89

JACOBS

TES IV



**JACOBS ENGINEERING GROUP INC.
ENVIRONMENTAL SYSTEMS DIVISION**

IN ASSOCIATION WITH:
TETRA TECH
METCALF & EDDY
ICAIR LIFE SYSTEMS
KELLOGG CORPORATION
GEO/RESOURCE CONSULTANTS
BATTELLE PACIFIC NORTHWEST LABORATORIES
DEVELOPMENT PLANNING AND RESEARCH ASSOCIATES

**U.S. ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL ENFORCEMENT SUPPORT
AT
HAZARDOUS WASTE SITES**

**TES IV
CONTRACT NO. 68-01-7351
EPA WORK ASSIGNMENT NO. R06006
RCRA LAND DISPOSAL RESTRICTIONS INSPECTION
AT
GATX TERMINALS CORPORATION
GALENA PARK, TEXAS
TXD026481523**

**JACOBS ENGINEERING GROUP INC.
10901 WEST 84TH TERRACE, SUITE 210
LENEXA, KANSAS 66214
JACOBS WORK ASSIGNMENT NO. 05-C015-00**

DCN:TES4-J06-1015-N2-004730

SEPTEMBER 16, 1989

RCRA LAND DISPOSAL RESTRICTIONS REPORT

PREPARED FOR

**U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VI
WASTE MANAGEMENT DIVISION**

Facility:	GATX Terminals Corporation 906 Clinton Drive Galena Park, Texas 77547-0486
EPA ID Number:	TXD026481523
Date of Inspection:	August 15, 1989
Jacobs Representatives:	Rick O. Horner, Geologist Laurie M. Smith, Industrial Hygienist
Facility Representative:	Lynn R. Jones, Environmental Coordinator
State Representative:	Marsha Hill, Texas Water Commission
Report Prepared By:	Laurie M. Smith
Report Date:	August 29, 1989

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
BACKGROUND	1
Nature and History of Operation	1
INVESTIGATION	1
Site Inspection	1
Record Review	1
ISSUES	3
LISTING OF POTENTIAL VIOLATIONS	4
<u>ATTACHMENTS</u>	
1 GATX Terminals Corporation Records	
2 GATX Terminals Corporation Photographs	
3 Land Disposal Restrictions Checklist	

**RCRA LAND DISPOSAL RESTRICTIONS INSPECTION
GATX TERMINALS CORPORATION
GALENA PARK, TEXAS
EPA ID NUMBER TXD026481523
REGION VI WORK ASSIGNMENT NO. R06006**

BACKGROUND

Nature and History of Operation

GATX Terminals Corporation (GATX) is a specialties warehouse which stores chemicals and petroleum products for manufacturers, blenders, and importers. GATX employs approximately 90 persons and operates 24 hours per day, seven days a week.

The primary operation at the GATX facility is storage of products for its customers. The customers lease tanks and are responsible for clean-out of the tanks as the product is removed. The leasee retains responsibility for the residues and wastewaters (rinses) generated from tank clean out. GATX also has a drum storage area for product storage to be used by their customers. GATX stores the drums until the customer is ready to use the material and picks it up.

Wastes generated as a result of operations at the facility and their final disposal methods are summarized in tabular form below:

Hazardous <u>Waste Code</u>	Hazardous <u>Waste Stream</u>	Disposal <u>Facility</u>	Disposal <u>Method</u>
U051	Creosote contaminated drilling and absorbent material	Rollins Environmental Services, Inc. Deer Park, TX	Incineration
D001, U165 U105, U069 U028, U050 U107, U022	Absorbent pipeline pigs	Rollins Environmental Services, Inc. Deer Park, TX	Incineration

INVESTIGATION

GATX is a full quantity generator of RCRA regulated hazardous wastes. A review of hazardous waste manifests revealed that wastes are disposed of via incineration by Rollins Environmental Services, Inc. of Deer Park, Texas.

According to facility representatives applicable Land Ban Restriction Notifications were submitted with each shipment of manifested wastes, as required. Copies of said notification were not available at inspection time.

Site Inspection

On August 15, 1989, a RCRA Compliance Evaluation Inspection (CEI) for the Land Disposal Restrictions (LDR) was performed by Jacobs Engineering Group Inc. (Jacobs) personnel at GATX Terminals Corporation. This inspection was performed under the Technical Enforcement Support (TES) IV Contract, Work Assignment No. R06006, for the U.S. Environmental Protection Agency

(EPA) Region VI. A representative of the Texas Water Commission was present during the inspection. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended.

The inspection was conducted by Rick O. Horner and Laurie M. Smith of Jacobs Engineering Group Inc., representing U.S. EPA, Region VI. Ms. Marsha Hill of the Texas Water Commission represented the State. Jacobs personnel and Ms. Hill were met by Mr. Lynn Jones, Environmental Coordinator of GATX.

This report consists of a summation of the following: a discussion of the facility's background, a review of the facility's hazardous waste management practices, a discussion of site observations accompanied by photographs, and document review.

Mr. Jones began the tour of the facility with a brief explanation of the facility lay-out. Operations at the GATX facility are divided into 4 sections: 1) Galena Park Central which comprises the tank farm and a tanker/truck loading/unloading area; 2) Galena Park East which includes ship and barge docks and a tank rail car loading/unloading area; 3) Galena Park West which consists of tanker truck and tank rail car loading/unloading areas and ship and barge docks; and 4) Lubripac, a grease and lube oil plant which is thirty percent owned by GATX.

Wastewaters from each of the above four sections of the facility are pumped to Tank 29 which has a 25,000 barrel capacity. Wastewaters are generated from activities such as collection pans in loading/unloading areas, line flushings, and spill clean-up. Mr. Jones stated that currently both Tanks 29 and 32 actively receive wastes; however, Tank 29 will be phased out and be completely replaced by Tank 32 in the near future. Tank 29 will, however, continue to receive some of the wastewater generated in the Galena Park East section.

From Tank 32, the wastewater is processed through an oil/water separator. Subsequent to separation, the oil phase is routed to Tank 3-9 and the water phase is piped to Tank 5-20 and then to Gulf Coast Water District Association for treatment.

The Texas Water Commission has classified the wastewater as U-listed hazardous waste due to the small amounts of commercial chemical product present in the stream. The oil phase is also a hazardous waste referred to as "mixed organic". The oil mixture contains fuel oil, aromatics, alcohols, and ethers. Mr. Jones explained that once all the tankage and sewer system is in place, the water phase which is sent to Gulf Coast will qualify for the domestic sewage exclusion under 40 CFR 261.4(a).

Composite samples of waste were taken from Tank 29 in March 1989. Rollins Environmental Services requested the sampling and analysis to determine the identity of U-listed hazardous wastes in the waste stream. Each of the U-listed wastes detected appears on the drums of waste taken from Tank 29 and the accompanying hazardous waste manifest.

Additional wastes generated by GATX include drilling and soils investigation wastes from the southeast holding pond. The drilling wastes were shipped in March 1989 to Rollins Environmental Services. Creosote and fuel oil contaminated drilling and investigation wastes (soils) and absorbent were manifested as soft hammer wastes. A copy of the soft hammer demonstration and certification is included in Attachment 1. Used absorbent is placed in 30-gallon fiber drums and soils are placed in either 30-gallon steel or plastic lined fiber drums. Rollins Environmental Services incinerates the absorbent material being newly generated due to the startup of a groundwater recovery program associated with the southeast holding pond (Photograph 1). Groundwater wells located on-site have been sampled since 1987.

Pipeline pigs and tank seals (foam, urethane, teflon and viton) have historically been listed as hazardous waste due to the characteristic of ignitability (D001). Currently the absorbent materials are listed as D001 and detected U-listed waste constituents based on GC/MS analyses.

One Handi-Kleen parts washer is located on the GATX site (Photograph 2). The unit uses a kerosene-type solvent (Agitene) which is allowed to evaporate. GATX does not use a commercial servicer to handle this waste.

Browning-Ferris Industries (BFI) handles the general trash for the facility.

Six (6) ship/barge docks are located at the GATX facility. Upon inspection of Barge Dock #2, one 55-gallon drum, labeled in black ink as "PIGS ONLY - UN1325 - FLAMMABLE SOLID" (Photographs 3 and 4) was observed. Mr. Jones indicated that this dock is in use approximately ninety percent of the year.

The hazardous waste storage area is located within a concrete building that is surrounded by a fence and a gate (Photograph 5). Access to the area is restricted. One-half of the storage area is used for empty drums which are either reconditioned by Bruback Drums or disposed of as general trash (Photographs 6 and 7). The remaining portion of the storage area contained twenty-three (23) 55-gallon drums and seven (7) 30-gallon drums of hazardous waste at the time of inspection (Photographs 8 and 9). All the drums were labeled as D001 hazardous waste. Violations noted included one drum without a lid and one drum not displaying an accumulation start date. Mr. Jones indicated; however, that wastes are not stored in excess of 90 days. The two portions of the hazardous waste storage area are divided by a concrete wall. The floor of the storage area is a steel grate over a drain area which appeared to be wet during the inspection. Mr. Jones attributed the liquid to rainfall. Mr. Jones indicated that immediately prior to shipping, the drums are repackaged and labeled with Department of Transportation (DOT) "flammable solid" stickers.

Record Review

According to Mr. Jones, applicable Land Ban Notifications were submitted with each shipment of wastes, as required. However, a review of the hazardous waste manifests revealed that copies of land disposal restriction notifications sent to the recovering facility with each shipment of hazardous waste sent to Rollins Environmental Services, Inc. had not been kept on file.

ISSUES

GATX formerly used a 19 million gallon surface impoundment for the collection of the facility's wastewater. The unit ceased receiving hazardous waste as of November 8, 1988 and has maintained inactive status since that time according to Mr. Jones. The impoundment contains sludge and will undergo RCRA closure as a landfill. Water from the impoundment is currently pumped to the tank farm to prevent overflow. The only inflow currently received by the impoundment is from rainfall. A National Pollution Discharge and Elimination System (NPDES) permit is in effect for the unit; however, GATX discharges only in emergencies.

Tank 10-12 had been phased out and brought back to product storage. Stormwater tanks 100-5 and 100-6 will be stripped, cleaned, and returned to service due to collecting other than stormwater in them.

During April 1989, a spill occurred in the Pasther Creek which runs adjacent to the GATX property line. The Coast Guard was called in to help contain the spill. The U.S. EPA, Region VI removed the booms, absorbent pads, and clothing and placed these items in a hopper (Photographs 10 and 11) where they remain while responsibility for the cleanup and disposal is under investigation.

One week prior to the inspection, a chemical pipeline from ARCO was brought online to transport benzene. A spill occurred during startup of the line. The benzene was reportedly recovered from the soil.

LISTING OF POTENTIAL VIOLATIONS

Upon completion of this report, the following potential violations are noted:

40 CFR 262.34(a)(1) - Accumulation Time A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. GATX had one drum in the hazardous waste storage area that was open.

40 CFR 268.50(a)(2)(i) - Prohibitions on Storage of Restricted Waste Each container must be marked with the date accumulation of hazardous waste began. GATX had one hazardous waste drum in storage without an accumulation start date.

40 CFR 268.7(a)(1) - Waste Analysis The generator must notify the treatment facility in writing of the requirements in 40 CFR 268.7(a)(1). GATX was unable to produce documentation on the day of the inspection that the appropriate notifications had been sent with the manifests.

ATTACHMENT 1

GATX TERMINALS CORPORATION RECORDS

GATX TERMINALS
CORPORATION906 CLINTON DRIVE
P. O. BOX 486
GALENA PARK, TEXAS 77547FAX (713) 455-~~1231~~

1769

FACSIMILE COVER LETTERDATE: 8-24-89FAX DIALED: 913-492-6198DELIVER TO: Laurie Smith COMPANY: Jacobs EngineeringNO. OF PAGES: 3
(INCLUDE COVER)VERIFICATION PHONE NUMBER: (713)455-1231FROM: LR JONESSENDER: LR JONES

Laurie,

MSDS

for "Agitator" parts

Cleaner.

LYNN

Section V - Health Hazard Data

2W352

Threshold Limit Value

100 PPM

Effects of Overexposure

MAY CAUSE SKIN AND EYE IRRITATION

Emergency First Aid Procedures

SKIN - IF CHAPPED, USE LANOLIN CREAM

EYE CONTACT, RINSE WITH WATER - SEE YOUR DOCTOR.

INHALATION - GET FRESH AIR, DO NOT INDUCE VOMITING IF SWALLOWED.

Section VI - Reactivity Data

Stability	Unstable		Conditions to Avoid
	Stable	X	

Incompatibility (Materials to Avoid)

Hazardous Decomposition Products

Hazardous Polymerization	May Occur		Conditions to Avoid
	Will Not Occur	X	

Section VII - Spill or Leak Procedures

Steps to be Taken in Case Material is Released or Spilled

USE OIL DRY OR SAND

Waste Disposal Method

Reclaimed by distiller or transported by scavenger

Waste disposal #D001

NOT BIO-DEGRADABLE

Section VIII - Special Protection Information

Respiratory Protection (Specify Type)

NONE

Ventilation	Local Exhaust		Special	NONE
	Mechanical (General)	IN SAME ROOM	Other	

Protective Gloves

POLYETHYLENE

Eye Protection

SAFETY GLASSES

Other Protective Equipment

GLOVES NOT NEEDED FOR INTERMITTENT USE

Section IX - Special Precautions

Precautions to be Taken in Handling and Storing

STORE IN COOL AREA AWAY FROM HEAT OR OPEN FLAME

Other Precautions

Material Safety Data Sheet

Revised under OSHA Safety and Health Regulations
for Shipyard Employment (29 CFR 1915)

U.S. Department of Labor 2W352

Occupational Safety and Health Administration

OMB No. 1218-0074
Expiration Date 05/31/86

W.W. Grainger

January 6, 1986

Section I

Manufacturer's Name

GRAYMILLS CORPORATION

Emergency Telephone Number

(312) 477-4100

Address (Number, Street, City, State and ZIP Code)

3705 N. LINCOLN AVE.

Chemical Name

and Synonyms D.O.T. CLEANING COMPOUND COMBUSTIBLE

Trade Name

and Synonyms SUPER AGITENE

CHICAGO, ILLINOIS 60613

UN # 1268

Chemical

Family

Formula

PETROLEUM DISTILLATES

Section II - Hazardous Ingredients

Paints, Preservatives, and Solvents

% TLV (Units) Alloys and Metallic Coatings

% TLV (Units)

Pigments

Base Metal

Catalyst

Alloys

Vehicle

Metallic Coatings

Solvents

ALIPHATIC HYDROCARBONS

98 100

Filler Metal

Plus Coating or Core Flux

Additives

.5

Others

Others

LANOLIN FOR THE SKIN

1.5

Hazardous Mixtures of Other Liquids, Solids or Gases

% TLV (Units)

PARAFIN - NAPHTHENES

CAS # 64742-88-7

~~50~~
50

100

DOWANOL DPM

CAS # 34590-94-8

.5

100

NOTE: THERE ARE NO BENZENES OR CHLORINATED SOLVENTS PRESENT

Section III - Physical Data

Boiling Point (°F)

318-388

Specific Gravity (H₂O=1)

.78

Vapor Pressure (mm Hg)

@20 °C

2.4

Percent Volatile by Volume (%)

98

Vapor Density (AIR=1)

4.8x

Evaporation Rate

ETHER *1)

52

Solubility in Water

NONE

Appearance and Odor

CLEAR GREEN - MILD OIL LIKE ODOR

Section IV - Fire and Explosion Hazard Data

Flash Point (Method Used)

110 °F TAG C.C.

Flammable Limits

Lel 1.0

Uel 6.0

Extinguishing Media

CO₂ - FOAM - DRY CHEMICALS

Special Fire Fighting Procedures

UPON CONTACT WITH OPEN FLAME, CARBON DIOXIDE AND SOME CARBON MONOXIDE IS GENERATED

Unusual Fire and Explosion Hazards

PROVIDE PROTECTIVE MASK



GATX TERMINALS CORPORATION

906 CLINTON DRIVE
P.O. BOX 486
GALENA PARK, TX 77547-0486
713-455-1231

August 14, 1989

Regional Administrator
United States Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Re: Section 268.8(a)(2)(ii) -- Demonstration and Certification

Dear Sir:

This demonstration and certification is submitted pursuant to 40 CFR 268.8(a)(2)(ii).

It is submitted in connection with a hazardous waste stream generated at this site:

GATX Terminals
P. O. Box 486
Galena Park, TX 77547

U.S. E.P.A. Generator No.: TXD026481523
U.S. Waste Code: U051
Texas Registration No.: 30573
Texas Waste Code: 978980
Rollins HO#: HO-26843-20/23

The stream is classified as a soft hammer waste. Pursuant to Section 268.8 we have made an effort to locate treatment or recovery facilities which provide the greatest environmental benefit. And, since treatment is available, GATX contracted with Rollins Environmental Services for incineration. Incineration in a RCRA-permitted incinerator, which destroys the hazardous constituents, is the best treatment that is practically available. Additionally, Appendix A is a list of other facilities contacted for treatment or recovery.

Therefore, I certify under penalty of law that the requirements of 40 CFR 268.8 (a)(1) have been met and that I have contracted to treat my waste by the practically available greatest environmental benefit, as indicated in my demonstration. I believe the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,

Lynn R. Jones
Environmental Engineer

LRJ/nro

cc: R. E. Butler
R. L. Commander



APPENDIX A

FACILITIES CONTACTED FOR TREATMENT OR RECOVERY

Facility Contacted:	ENSCO
Facility Official Contacted:	Martin Wernick
Address:	333 Executive Court Little Rock, Arkansas 72205
Telephone:	(405) 329-6782
Technology:	Incineration
Facility Contacted:	Chemical Waste Management
Facility Official Contacted:	Kenneth Koehen
Address:	515 West Green Road, Suite 400 Houston, Texas 77067
Telephone:	(713) 875-1110
Technology:	Incineration

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 12-31-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TXD0026481523129370	Manifest Document No. 1	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address GATX Terminals P.O. Box 486 Galena Park TX 77547				A. State Manifest Document Number NO 00553041			
4. Generator's Phone 713 455 1231				B. State Generator's ID 30573			
5. Transporter 1 Company Name Rollins Environmental Services				C. State Transporter's ID 46756			
6. US EPA ID Number 11-17-1571-4-5-X				D. Transporter's Phone 713-471-4861			
7. Transporter 2 Company Name				E. State Transporter's ID			
8. US EPA ID Number				F. Transporter's Phone			
9. Designated Facility Name and Site Address Rollins Environmental Services 2027 Battleground Road Dec. Park TX 77536				G. State Facility's ID 01429 50089			
10. US EPA ID Number TXD055141378				H. Facility's Phone 713 479 6001			
11A HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
X	Hazardous waste: Solid waste, stabilized GATX Terminals Corp. with Grease Acetate Galena Park, Texas			38 DM	24180	P	978980
b.	MAR 11 1989						
c.							
d.	REB — SDI — TPS — WS — <u>W</u> — SET — DLP — NG — EJ — LAB — CMB — TCP — BJB — FILE —						
J. Additional Descriptions for Materials Listed Above Rollins HO-26843-23 (20) Two Class I Hazardous Waste 978980 EPA 4051-				K. Handling Codes for Wastes Listed Above T-07			
15. Special Handling Instructions and Additional Information STAY UPWIND & DO NOT TOUCH SPILLED MATERIAL. IN CASE OF EMERGENCY CONTACT SHIFT FOREMAN 713 455 1231							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name Wayne E. Simmons				Signature <i>[Signature]</i>		Month Day Year 03/10/89	
17. Transporter 1 Acknowledgement of Receipt of Materials				Date			
Printed/Typed Name Ralph A. Bell				Signature <i>[Signature]</i>		Month Day Year 03/11/89	
18. Transporter 2 Acknowledgement of Receipt of Materials				Date			
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name RES (TX) Inc				Signature Lynette Spiller		Month Day Year 03/10/89	

File
Copy

INCINERATION STREAMS

Regional Administrator
U. S. Environmental Protection Agency
Region VI

Re: Section 268.8(a)(2)(ii) Demonstration and Certification

Dear Mr. Lytton:

This demonstration and certification is submitted pursuant to 40 CFR 268.8(a)(2)(ii).

It is submitted in connection with a hazardous waste stream generated at this facility. The stream is classified by EPA waste code number 1051, which is a "first third" "soft hammer" waste. Pursuant to Section 268.8 we have made an effort to locate treatment or recovery facilities which provide the greatest environmental benefit.

Because this stream is an organic stream (see attached waste stream chemical description), the greatest environmental benefit would be provided by RCRA-authorized incineration which destroys the hazardous constituents. Since such treatment is available, we have contracted with a RCRA authorized incineration facility for treatment of the waste by incineration. That facility is Rollins Environmental Services (ES) Inc. (EPA ID Number TXD055741378).

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,



LAND DISPOSAL RESTRICTIONS INFORMATION
RESTRICTED WASTE FOR INCINERATION

Customer Name: GATX Terminals
Customer EPA ID Number: TX0026401523
Customer Address: P.O. Box 406
Galveston, TX 77550

Reference Number: BR/HO/L 40-26843-23120

Under manifest number 00553041 we are shipping to you, for incineration, a waste stream classified by EPA Hazardous Waste Number(s) 11051

A. The EPA land disposal restriction regulations (40 CFR 268)

☐ Apply to this stream, under the following category or categories:

☐ Solvent/dioxin (see Attachment 1)

☐ California list, specifically (see Attachment 2):

☐ "First Third" list (see Attachment 3)

☐ Do not apply to this stream. (Skip following questions. Sign on p. 2)

B. The stream must be incinerated because (check one):

☐ 1. Incineration is the treatment technology prescribed by 40 CFR 268.42. (PCBs*; and--after Nov. 8, 1988--wastes, except wastewaters, containing Halogenated Organic Compounds in total concentration of 1000 mg/kg or 1000 mg/l, or more.)

☐ 2. The stream is an F001-F005 solvent, or a "First Third" waste containing organics or other non-metals (Attachment 3, Item 1). The following constituents identified in Table CCW or Table CCWE (see Attachment 4) of 40 CFR 268, must be treated to at least the level specified below (use reverse side for additional constituents):

Constituent	Treatment Standard	Per Table	
		CCW	CCWE
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

*Only RES (TX) accepts PCBs, for incineration.

Effective Date of Form: 8/8/88
Revised: 8/17/88

(Incineration p. 2)

3. The stream is a liquid hazardous waste that is primarily water and contains HOCs in total concentration greater than or equal to 1,000 mg/l and less than 10,000 mg/l HOCs. It must be treated to less than 1,000 mg/l.

4. The stream is a "Soft Hammer" waste containing organics or other non-metals (Attachment 3, Item 5) and must be treated by the best treatment practically available. Enclosed is a copy of the signed and dated demonstration and certification which we have submitted to the EPA Regional Administrator pursuant to 40 CFR 268.8(a)(2)(ii). (For subsequent shipments of the same stream, only a copy of the certification need be enclosed, if the demonstration is a separate document.)

Authorized representative signature *[Signature]*

Print or type name W. E. Simmons

Title TERMINAL SUPERINTENDENT Date 3/9/89

Note: There are limited exceptions to the requirement for incineration in some of the above cases, such as for contaminated soil from Superfund sites. RES representatives can advise you regarding these exceptions.

Effective Date of Form: 8/8/88
Revised: 8/17/88



GATX TERMINALS CORPORATION

906 CLINTON DRIVE
P.O. BOX 486
GALENA PARK, TX 77547-0486
713-455-1231

August 10, 1989

Regional Administrator
United States Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Re: Section 268.8(a)(2)(ii) -- Demonstration and Certification

Dear Sir:

This demonstration and certification is submitted pursuant to 40 CFR 268.8(a)(2)(ii).

It is submitted in connection with a hazardous waste stream generated at this site:

GATX Terminals
P. O. Box 486
Galena Park, TX 77547

U.S. E.P.A. Generator No.: TXD026481523
U.S. Waste Code: D001, U165, U105, U069, U028,
U050, U107, U022
Texas Registration No.: 30573
Texas Waste Code: 981510
Rollins HO#: HO-22428-24/20

The stream is classified as a soft hammer waste. Pursuant to Section 268.8 we have made an effort to locate treatment or recovery facilities which provide the greatest environmental benefit. And, since treatment is available, GATX contracted with Rollins Environmental Services for incineration. Incineration in a RCRA-permitted incinerator, which destroys the hazardous constituents, is the best treatment that is practically available. Additionally, Appendix A is a list of other facilities contacted for treatment or recovery.

Therefore, I certify under penalty of law that the requirements of 40 CFR 268.8 (a)(1) have been met and that I have contracted to treat my waste by the practically available greatest environmental benefit, as indicated in my demonstration. I believe the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,

Lynn R. Jones
Environmental Engineer

LRJ/nro
cc: R. E. Butler
R. L. Commander
File

APPENDIX A

FACILITIES CONTACTED FOR TREATMENT OR RECOVERY

Facility Contacted: ENSCO
Facility Official Contacted: Martin Wernick
Address: 333 Executive Court
Little Rock, Arkansas 72205
Telephone: (405) 329-6782
Technology: Incineration

Facility Contacted: Chemical Waste Management
Facility Official Contacted: Kenneth Koehen
Address: 515 West Green Road, Suite 400
Houston, Texas 77067
Telephone: (713) 875-1110
Technology: Incineration

TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman
Paul Hopkins, Commissioner
John O. Houchins, Commissioner



Allen Beinke, Executive Director
Michael E. Field, General Counsel
Brenda W. Foster, Chief Clerk

January 27, 1989

GATX Terminals Corp.
Galena Park, Texas

FEB 01 1989

Lynn R. Jones
GATX Terminals Corporation
Post Office Box 486
Galena Park, Texas 77547-0486

REB <u>2/1</u>	RDL	TPS	
WS	<u>LJ</u>	SET	
DLP	NG	EJ	LAB
CMB	TCP	BJB	FILE

Re: Thirty (30) Day Extension
Texas Water Commission (TWC) Registration Number 30573

Dear Mr. Jones:

This is in response to your letter of January 10, 1989 requesting a 30 day extension for the accumulation of hazardous waste on your site. According to 31 Texas Administrative Code (TAC) Section 335.69(b), the Executive Director may grant an extension up to 30 days if hazardous waste must remain on-site for longer than 90 days due to unforeseen, temporary and uncontrollable circumstances.

The Commission believes the delay to incinerate your waste material (978980) imposed by Rollins Environmental Services due to a backlog at their facility in Deer Park is a circumstance beyond your control and a basis to grant an extension pursuant to 31 TAC 335.69(b). Please note that the additional 30 day period begins at the close of the original 90 day limit, NOT from the date of this letter. You are further advised that the Commission feels the company should explore every alternative possible to avoid any future problems of similar nature in handling and disposing of its hazardous waste.

Sincerely,

A handwritten signature in cursive script that reads "Bobby D. Whitefield".

Bobby D. Whitefield, Chief
Information and Technical Services Section
Hazardous and Solid Waste Division

JBL:ls

cc: Texas Water Commission Southeast Region - Deer Park Office



GATX TERMINALS CORPORATION

906 CLINTON DRIVE
P.O. BOX 486
GALENA PARK, TX 77547-0486
713-455-1231

P 714 663 006

January 10, 1989

Mr. John Latchford
Texas Water Commission
P. O. Box 13087
Capitol Station
Austin, Texas 78711-3087

Re: Request for 30 Day Extension of the Holding Time (less than 90 days) for Hazardous Waste - Registration No. 30573 - GATX Terminals, Galena Park

Dear Mr. Latchford:

As a followup to our phone conversation, January 3, 1989, GATX Terminals is requesting an additional 30 days of holding time for 23 drums of drilling material generated on November 5, 1988, in accordance with TAC 335.69.b. The TWC waste code is 978980 and the EPA waste number is U051.

Discussion

Because the EPA waste U051 is covered under the first third rule, GATX undertook an agreement with Rollins Environmental Services to incinerate the waste material. Due to delays of the incinerator facility, located in Deer Park, the material was placed on a backlog list, and will not be incinerated before February 3, 1989 (i.e., 90 days from November 5, 1988).

Thank you for your time and if you need any further information, please contact me at (713) 455-1231.

Sincerely,

Lynn R. Jones
Environmental Engineer

LRJ/dms

cc: R. E. Butler
R. L. Commander
TWC-Southeast Regional Office, Mr. Bill VanEvers
File



Professional Service Industries, Inc.

ANALYTICAL REPORT

TESTED FOR: GATX TERMINALS
Post Office Box 486
Galena Park, TX 77547

PROJECT: Chemical Analysis

ATTN: Lynn R. Jones

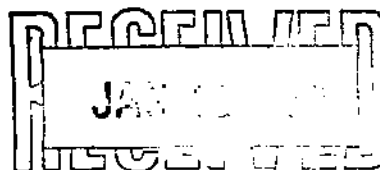
DATE: January 10, 1989

OUR REPORT NO 213-83087-03

REMARKS: Date Received: December 28, 1988
Sample Identification: Two samples labeled below.
Methodology Employed: SW 846/Standard Methods, 16th Edition

TEST RESULTS:

	<u>Results</u>	<u>Method #</u>	<u>Performed by</u>
Sample ID: PD-1 P16 Drum 12/12/88-12/28/88			
TOC, mg/kg as received basis	3010	505 A	AF 1/3/89, 0850
Sample ID: RCW-1 (Creosote Contaminated)			
TOC, mg/kg as received basis	2258	505 A	AF 1/3/89, 0850



GATX

213-83087-03

Page 2

Sample ID: PD-1 P16 Drum 12/12/88-12/28/88

SW 8240 Volatile Compound

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
Chloromethane	BRL	0.3
Bromomethane	BRL	0.3
Vinyl chloride	BRL	0.3
Chloroethane	BRL	0.3
Dichloromethane	BRL	0.3
Acetone	BRL	3.0
Carbon disulfide	BRL	0.3
1,1-Dichloroethene	BRL	0.3
1,1-Dichloroethane	BRL	0.3
2-Butanone	BRL	0.3
Trans-1,2-dichloroethene	BRL	0.3
Chloroform	BRL	0.3
1,2-Dichloroethane	BRL	0.3
1,1,1-Trichloroethane	0.5	0.3
Carbon tetrachloride	BRL	0.3
Bromodichloromethane	BRL	0.3
1,2-Dichloropropane	BRL	0.3
Vinyl acetate	BRL	0.3
Cis-1,3-dichloropropene	BRL	0.3
Trichloroethene	BRL	0.3
Dibromochloromethane	BRL	0.3
1,1,2-Trichloroethane	BRL	0.3
Benzene	100	0.3
Trans-1,3-dichloropropane	BRL	0.3
2-Chloroethylvinylether	BRL	0.3
Bromoform	BRL	0.3
2-Hexanone	BRL	0.3
4-Methyl-2-pentanone	BRL	0.3
Tetrachloroethene	BRL	0.3
1,1,2,2-Tetrachloroethane	BRL	0.3
Toluene	300	0.3
Chlorobenzene	BRL	0.3
Ethylbenzene	300	0.3
Styrene	BRL	0.3
Total xylenes	5000	0.3
1,2-Dichlorobenzene	BRL	0.3
1,3-Dichlorobenzene	BRL	0.3
1,4-Dichlorobenzene	BRL	0.3

BDL = Below Reporting Limit

Surrogate recoveries, %

1,2-Dichloroethane-d4	88.0
Toluene-d8	90.0
Bromofluorobenzene	100.0

GATX
 213-83087-03
 Page 3
 Sample ID: PD-1 P16 Drum 12/12/88-12/28/88

SW 8270 Base-Neutal and Acid Extractable Compounds

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
Phenol	BRL	0.66
Bis(2-chloroethyl)ether	BRL	0.66
2-Chlorophenol	BRL	0.66
1,3-Dichlorobenzene	BRL	0.66
1,4-Dichlorobenzene	BRL	0.66
Benzyl alcohol	BRL	1.30
1,2-Dichlorobenzene	BRL	0.66
2-Methylphenol	BRL	0.66
Bis(2-chloroisopropyl)ether	BRL	0.66
4-Methylphenol	BRL	0.66
N-Nitrosodi-N-propylamine	BRL	0.66
Hexachloroethane	BRL	0.66
Nitrobenzene	BRL	0.66
Isophorone	BRL	0.66
2-Nitrophenol	BRL	0.66
2,4-Dimethylphenol	BRL	0.66
Benzoic acid	BRL	3.30
Bis(2-chloroethoxy)methane	BRL	0.66
2,4-Dichlorophenol	BRL	0.66
1,2,4-Trichlorobenzene	BRL	0.66
Naphthalene	BRL	0.66
4-Chloroaniline	BRL	1.30
Hexachlorobutadiene	BRL	0.66
4-Chloro-3-methylphenol	BRL	0.66
2-Methylnaphthalene	57	0.66
Hexachlorocyclopentadiene	BRL	0.66
2,4,6-Trichlorophenol	BRL	0.66
2,4,5-Trichlorophenol	BRL	0.66
2-Chloronaphthalene	BRL	0.66
2-Nitroaniline	BRL	3.30
Dimethylphthalate	BRL	0.66
Acenaphthylene	BRL	0.66
3-Nitroaniline	BRL	3.30
Acenaphthene	BRL	0.66
2,4-Dinitrophenol	BRL	3.30
4-Nitrophenol	BRL	0.66
Dibenzofuran	BRL	0.66
2,4-Dinitrotoluene	BRL	0.66
2,6-Dinitrotoluene	BRL	0.66
Diethylphthalate	BRL	0.66

-Continued-

SW 8270 Base-Neutral and Acid Extractable Compounds
(Continued)

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
4-Chlorophenyl-phenylether	BRL	0.66
Fluorene	BRL	0.66
4-Nitroaniline	8.5	3.30
4,6-Dinitro-2-methylphenol	BRL	3.30
N-Nitrosodiphenylamine	BRL	0.66
4-Bromophenyl-phenylether	BRL	0.66
Hexachlorobenzene	BRL	0.66
Pentachlorophenol	BRL	3.30
Phenanthrene	100	0.66
Anthracene	BRL	0.66
Di-n-butylphthalate	BRL	0.66
Fluoroanthene	360	0.66
Pyrene	270	0.66
Benzylbutylphthalate	BRL	0.66
3,3'-Dichlorobenzidine	BRL	1.30
Benzo(a)anthracene	86	0.66
Bis(2-ethylhexyl)phthalate	900	0.66
Chrysene	290	0.66
Di-n-octylphthalate	15	0.66
Benzo(b)fluoranthene	160	0.66
Benzo(k)fluoroanthene	BRL	0.66
Benzo(a)pyrene	93	0.66
Indeno(1,2,3-cd)pyrene	89	0.66
Dibenzo(a,h)anthracene	BRL	0.66
Benzo(g,h,i)perylene	77	0.66

BRL = Below Reporting Limit

GATX
 213-83087-03
 Page 5
 Sample ID: RCW-1

SW 8240 Volatile Compound

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
Chloromethane	BRL	0.3
Bromomethane	BRL	0.3
Vinyl chloride	BRL	0.3
Chloroethane	BRL	0.3
Dichloromethane	BRL	0.3
Acetone	BRL	3.0
Carbon disulfide	BRL	0.3
1,1-Dichloroethene	BRL	0.3
1,1-Dichloroethane	BRL	0.3
2-Butanone	BRL	0.3
Trans-1,2-dichloroethene	BRL	0.3
Chloroform	BRL	0.3
1,2-Dichloroethane	1	0.3
1,1,1-Trichloroethane	BRL	0.3
Carbon tetrachloride	0.7	0.3
Bromodichloromethane	BRL	0.3
1,2-Dichloropropane	BRL	0.3
Vinyl acetate	BRL	0.3
Cis-1,3-dichloropropene	BRL	0.3
Trichloroethene	0.3	0.3
Dibromochloromethane	BRL	0.3
1,1,2-Trichloroethane	**	0.3
Benzene	200	0.3
Trans-1,3-dichloropropane	BRL	0.3
2-Chloroethylvinylether	BRL	0.3
Bromoform	BRL	0.3
2-Hexanone	BRL	0.3
4-Methyl-2-pentanone	BRL	0.3
Tetrachloroethene	6	0.3
1,1,2,2-Tetrachloroethane	1	0.3
Toluene	40	0.3
Chlorobenzene	BRL	0.3
Ethylbenzene	20	0.3
Styrene	8	0.3
Total xylenes	40	0.3
1,2-Dichlorobenzene	BRL	0.3
1,3-Dichlorobenzene	BRL	0.3
1,4-Dichlorobenzene	BRL	0.3

BDL = Below Reporting Limit

Surrogate recoveries, %

1,2-Dichloroethane-d4	88.0
Toluene-d8	91.0
Bromofluorobenzene	107.0

GATX
 213-83087-03
 Page 6
 Sample ID: RCW-1

SW 8270 Base-Neutral and Acid Extractable Compounds

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
Phenol	3.8	0.66
Bis(2-chloroethyl)ether	BRL	0.66
2-Chlorophenol	BRL	0.66
1,3-Dichlorobenzene	BRL	0.66
1,4-Dichlorobenzene	BRL	0.66
Benzyl alcohol	**	1.30
1,2-Dichlorobenzene	BRL	0.66
2-Methylphenol	23	0.66
Bis(2-chloroisopropyl)ether	BRL	0.66
4-Methylphenol	71	0.66
N-Nitrosodi-N-propylamine	BRL	0.66
Hexachloroethane	BRL	0.66
Nitrobenzene	**	0.66
Isophorone	BRL	0.66
2-Nitrophenol	BRL	0.66
2,4-Dimethylphenol	12	0.66
Benzoic acid	BRL	3.30
Bis(2-chloroethoxy)methane	BRL	0.66
2,4-Dichlorophenol	BRL	0.66
1,2,4-Trichlorobenzene	BRL	0.66
Naphthalene	30	0.66
4-Chloroaniline	BRL	1.30
Hexachlorobutadiene	BRL	0.66
4-Chloro-3-methylphenol	BRL	0.66
2-Methylnaphthalene	17	0.66
Hexachlorocyclopentadiene	BRL	0.66
2,4,6-Trichlorophenol	BRL	0.66
2,4,5-Trichlorophenol	BRL	0.66
2-Chloronaphthalene	BRL	0.66
2-Nitroaniline	BRL	3.30
Dimethylphthalate	BRL	0.66
Acenaphthylene	**	0.66
3-Nitroaniline	BRL	3.30
Acenaphthene	10	0.66
2,4-Dinitrophenol	**	3.30
4-Nitrophenol	BRL	0.66
Dibenzofuran	9.2	0.66
2,4-Dinitrotoluene	BRL	0.66
2,6-Dinitrotoluene	BRL	0.66
Diethylphthalate	BRL	0.66

-Continued-

SW 8270 Base-Neutral and Acid Extractable Compounds
(Continued)

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
4-Chlorophenyl-phenylether	BRL	0.66
Fluorene	9.1	0.66
4-Nitroaniline	BRL	3.30
4,6-Dinitro-2-methylphenol	**	3.30
N-Nitrosodiphenylamine	BRL	0.66
4-Bromophenyl-phenylether	BRL	0.66
Hexachlorobenzene	BRL	0.66
Pentachlorophenol	BRL	3.30
Phenanthrene	24	0.66
Anthracene	5.3	0.66
Di-n-butylphthalate	1.0	0.66
Fluoroanthene	13	0.66
Pyrene	6.9	0.66
Benzylbutylphthalate	BRL	0.66
3,3'-Dichlorobenzidine	BRL	1.30
Benzo(a)anthracene	1.2	0.66
Bis(2-ethylhexyl)phthalate	BRL	0.66
Chrysene	2.2	0.66
Di-n-octylphthalate	BRL	0.66
Benzo(b)fluoranthene	0.7	0.66
Benzo(k)fluoroanthene	BRL	0.66
Benzo(a)pyrene	93	0.66
Indeno(1,2,3-cd)pyrene	89	0.66
Dibenzo(a,h)anthracene	BRL	0.66
Benzo(g,h,i)perylene	77	0.66

BRL = Below Reporting Limit



Rollins Environmental Services (TX) Inc.

P O Box 609, Deer Park, Texas 77536 (713) 479-6001

HO. 26.843-

WILL BE ASSIGNED BY RES(TX), INC.

1 BILLING INFORMATION		2 PICK-UP LOCATION													
COMPANY NAME <u>GATX Terminals</u>		COMPANY NAME <u>GATX Terminals</u>													
ADDRESS <u>P.O. Box 486</u>		ADDRESS <u>P.O. Box 486</u>													
CITY <u>Galena Park</u> STATE <u>TX</u> ZIP <u>77547</u>		CITY <u>Galena Park</u> STATE <u>TX</u> ZIP <u>77547</u>													
CONTACT <u>Nita Gresham</u> PHONE <u>455 1231</u>		CONTACT <u>Lynn R Jones</u> PHONE <u>455 1231</u>													
3 MANIFEST INFORMATION		4 GENERATOR INFORMATION													
COMPANY NAME <u>GATX Terminals</u>		USEPA ID <u>TXD026481523</u> TWC ID <u>30573</u>													
ADDRESS <u>P.O. Box 486</u>		NAME <u>L.R. Jones</u> PHONE <u>455 1231</u>													
CITY <u>Galena Park</u> STATE <u>TX</u> ZIP <u>77547</u>		TECHNICAL CONTACT													
CONTACT <u>L.R. Jones</u> PHONE <u>455 1231</u>		NAME <u>W. Simmons</u> PHONE <u>455 1231</u>													
		EMERGENCY CONTACT													
5 GENERAL INFORMATION															
GENERAL WASTE DESCRIPTION <u>Stabilized Soil Contaminated with Creosote</u>															
PROCESS GENERATING WASTE <u>Drilling Cuttings & Leaking Tank</u>															
QUANTITY GENERATED <u>30 Drums</u> PER <u>year</u>		FREQUENCY OF REMOVAL <u>N/A</u> TIME(S) PER <u>N/A</u>													
UNITS		NUMBER PERIOD													
6 SHIPPING INFORMATION															
D.O.T. HAZARDOUS MATERIAL? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		TEXAS WASTE CODE NO <u>978980</u>													
D.O.T. PROPER SHIPPING NAME <u>HAZARDOUS WASTE SOLID, N.O.S.</u>															
D.O.T. HAZARD CLASS <u>HAZARDOUS WASTE</u> D.O.T. ID. NO. <u>NA 9189</u> RO <u>100 #</u>															
USEPA HAZARDOUS WASTE NUMBER(S) <u>U051</u>															
REASON FOR THE ABOVE CLASSIFICATION(S) <u>Leaking Creosote Storage Tank</u>															
<table border="1"><thead><tr><th>HAZARDOUS SUBSTANCE</th><th>CONCENTRATION</th><th>HAZARDOUS SUBSTANCE</th><th>CONCENTRATION</th></tr></thead><tbody><tr><td><u>Creosote</u></td><td><u>0-1000 ppm</u></td><td></td><td></td></tr><tr><td><u>Chlorinated Solvents</u></td><td><u>0-100 ppm</u></td><td></td><td></td></tr></tbody></table>				HAZARDOUS SUBSTANCE	CONCENTRATION	HAZARDOUS SUBSTANCE	CONCENTRATION	<u>Creosote</u>	<u>0-1000 ppm</u>			<u>Chlorinated Solvents</u>	<u>0-100 ppm</u>		
HAZARDOUS SUBSTANCE	CONCENTRATION	HAZARDOUS SUBSTANCE	CONCENTRATION												
<u>Creosote</u>	<u>0-1000 ppm</u>														
<u>Chlorinated Solvents</u>	<u>0-100 ppm</u>														
7 SHIPPING METHOD															
<input type="checkbox"/> TANK TRUCK		<input type="checkbox"/> DUMP BIN													
<input type="checkbox"/> TANK CAR		<input type="checkbox"/> DUMP TRUCK													
<input type="checkbox"/> ENCLOSURE VAN		<input type="checkbox"/> CUSTOMER DELIVERY													
<input type="checkbox"/> VACUUM TRUCK		<input type="checkbox"/> ROLL-OFF BIN													
<input type="checkbox"/> FLATBED		<input type="checkbox"/> OTHER													
8 GENERATOR'S METHOD OF COLLECTION															
DRUMS TYPE / SIZE <u>55 gallon tank</u> OTHER															
OTHER SHIPPING REQUIREMENTS OR INFORMATION															
9															
<input type="checkbox"/> ADDITIONAL DATA ATTACHED <input checked="" type="checkbox"/> SAMPLE PROVIDED <input type="checkbox"/> GENERATORS SAMPLE NO.															

EVERY ITEM ON THIS WASTE DATA SHEET MUST BE COMPLETE

CHAMPION BUSINESS FORMS — Form No. 80

10 HAZARDOUS CHARACTERISTICS																																																			
<input type="checkbox"/> OSHA LISTED COMPOUNDS <input type="checkbox"/> PESTICIDES WITH SPECIFIC DISPOSAL REQUIREMENTS <input type="checkbox"/> ETIOLOGICAL AGENTS		<input type="checkbox"/> RADIOACTIVE <input type="checkbox"/> PCB's ≥ 50 ppm <input type="checkbox"/> INFECTIOUS AGENTS																																																	
		<input type="checkbox"/> DIOXIN <input type="checkbox"/> BIOLOGICAL MATERIALS <input type="checkbox"/> PATHOGENS <input type="checkbox"/> ASBESTOS																																																	
11 CHEMICAL COMPOSITION		SHOULD TOTAL 100%																																																	
CHEMICAL NAME	CONC %	CHEMICAL NAME	CONC %																																																
Soil - Clay - Sand, Silt	96-100																																																		
Organics - GC/MS	0-1																																																		
Used Drilling Material (C)	0-3																																																		
Gloves, Bags, plastic etc.																																																			
PLEASE ATTACH ADDITIONAL SHEETS AS REQUIRED																																																			
12 CHARACTERISTICS																																																			
COLOR: <u>Light to Dark</u> APPEARANCE: <u>Soil</u>	ODOR: <input type="checkbox"/> NONE <input type="checkbox"/> MILD <input checked="" type="checkbox"/> STRONG OTHER: _____	PHYSICAL STATE @ 70 F: <input type="checkbox"/> GASEOUS <input checked="" type="checkbox"/> SOLID <input type="checkbox"/> LIQUID <input type="checkbox"/> SEMI-SOLID <input type="checkbox"/> POWDER	LAYERING: <input checked="" type="checkbox"/> NONE <input type="checkbox"/> BI-LAYERED <input type="checkbox"/> MULTI-LAYERED																																																
CORROSIVITY pH <u>5-8</u> Corrosion Rate, ipy <u>None</u>	IGNITABILITY Flash Point, F <u>> 200</u> <input checked="" type="checkbox"/> Open Cup <input type="checkbox"/> Closed Cup	FREE LIQUID: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO % BY VOLUME <u>< 1%</u> Vapor Pressure, mm Hg @ 25 C <u>0-3 psig</u> Specific Gravity <u>1-1.23</u>																																																	
13 METALS		14 REACTIVITY																																																	
See Attach <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>TOTAL/UNITS</th> <th>EP TOX/UNITS</th> <th>TOTAL/UNITS</th> <th>EP TOX/UNITS</th> </tr> </thead> <tbody> <tr> <td>Pb <u>34</u></td> <td><u>40.1</u></td> <td>Pb <u>34</u></td> <td><u>40.1</u></td> </tr> <tr> <td>Ag <u>40.1</u></td> <td><u>40.1</u></td> <td>Se <u>40.1</u></td> <td><u>40.1</u></td> </tr> <tr> <td>As <u>10.1</u></td> <td><u>10.1</u></td> <td>Cu <u>5</u></td> <td><u>N/A</u></td> </tr> <tr> <td>Ba <u>N/A</u></td> <td><u>20.52</u></td> <td>K <u>N/A</u></td> <td><u>N/A</u></td> </tr> <tr> <td>Cd <u>20</u></td> <td><u>40.1</u></td> <td>Na <u>N/A</u></td> <td><u>N/A</u></td> </tr> <tr> <td>Cr <u>60</u></td> <td><u>40.1</u></td> <td>Mn <u>N/A</u></td> <td><u>N/A</u></td> </tr> <tr> <td>Hg <u>40.001</u></td> <td><u>4000.5</u></td> <td>Sn <u>N/A</u></td> <td><u>N/A</u></td> </tr> <tr> <td>P <u>N/A</u></td> <td><u>N/A</u></td> <td>Zn <u>19.7</u></td> <td><u>N/A</u></td> </tr> <tr> <td>S <u>27.0</u></td> <td><u>N/A</u></td> <td>Ti <u>40.5</u></td> <td><u>N/A</u></td> </tr> <tr> <td>Si <u>N/A</u></td> <td><u>N/A</u></td> <td>Ni <u>5.4</u></td> <td><u>N/A</u></td> </tr> <tr> <td>Be <u>4.1</u></td> <td><u>N/A</u></td> <td>Cr <u>VI</u></td> <td><u>4.1</u></td> </tr> </tbody> </table>		TOTAL/UNITS	EP TOX/UNITS	TOTAL/UNITS	EP TOX/UNITS	Pb <u>34</u>	<u>40.1</u>	Pb <u>34</u>	<u>40.1</u>	Ag <u>40.1</u>	<u>40.1</u>	Se <u>40.1</u>	<u>40.1</u>	As <u>10.1</u>	<u>10.1</u>	Cu <u>5</u>	<u>N/A</u>	Ba <u>N/A</u>	<u>20.52</u>	K <u>N/A</u>	<u>N/A</u>	Cd <u>20</u>	<u>40.1</u>	Na <u>N/A</u>	<u>N/A</u>	Cr <u>60</u>	<u>40.1</u>	Mn <u>N/A</u>	<u>N/A</u>	Hg <u>40.001</u>	<u>4000.5</u>	Sn <u>N/A</u>	<u>N/A</u>	P <u>N/A</u>	<u>N/A</u>	Zn <u>19.7</u>	<u>N/A</u>	S <u>27.0</u>	<u>N/A</u>	Ti <u>40.5</u>	<u>N/A</u>	Si <u>N/A</u>	<u>N/A</u>	Ni <u>5.4</u>	<u>N/A</u>	Be <u>4.1</u>	<u>N/A</u>	Cr <u>VI</u>	<u>4.1</u>	<input type="checkbox"/> EXPLOSIVE <input type="checkbox"/> WATER REACTIVE <input type="checkbox"/> PYROPHORIC <input type="checkbox"/> SHOCK SENSITIVE <input type="checkbox"/> REACTIVE CYANIDE <input type="checkbox"/> REACTIVE SULFIDE <input type="checkbox"/> OTHER _____	
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FLUORINE _____ BROMINE _____ CHLORINE _____ IODINE _____		MELTING POINT <u>N/A</u> F CHLORIDES <u>N/A</u> % ASH <u>N/A</u> % BOILING POINT <u>N/A</u> F TOC <u>< 10000</u> mg/l TOTAL CN <u>20.05</u> % TOTAL SOLIDS <u>N/A</u> % BOD <u>N/A</u> mg/l TOTAL S <u>N/A</u> % TOTAL DISSOLVED SOLIDS <u>N/A</u> % COD <u>N/A</u> mg/l VISCOSITY <u>N/A</u> cP																																																	
17 EP TOX ORGANICS																																																			
See attached ENDRI <u>none</u> ppm METHOXYCHLOR <u>none</u> ppm 2,4-DICHLORPHENOXYACETIC ACID <u>none</u> ppm LINDANE <u>none</u> ppm TOXAPHENE <u>none</u> ppm 2,4,5-TRICHLOROPHENOXYPROPIONIC ACID <u>none</u> ppm																																																			
18 LAND DISPOSAL RESTRICTIONS																																																			
IS THIS WASTE RESTRICTED FROM DIRECT LAND DISPOSAL BY ANY REGULATIONS THAT ARE IN EFFECT ON THE DATE OF THIS WASTE DATA SHEET? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YES, DESCRIBE WHICH RESTRICTION(S) APPLIES TO THIS WASTE. SEE 40CFR PART 268 <u>FIRST THIRD SOFT HAMMER - PREVIOUSLY LAND</u> <u>FILLED ROLLOWS NO-26843-52</u>																																																			
19 I HEREBY CERTIFY AND WARRANT THAT THE INFORMATION SUPPLIED ON THIS FORM AND ON ANY ATTACHMENTS OR SUPPLEMENTS REGARDING THE IDENTIFICATION OF THIS WASTE, ITS CONSTITUENTS AND ITS KNOWN OR SUSPECTED HAZARDS IS COMPLETE AND ACCURATE. I FURTHER CERTIFY AND WARRANT THAT THE IDENTIFICATION IS THE RESULT OF AN ANALYSIS OF A REPRESENTATIVE SAMPLE OF THE WASTE OBTAINED AND ANALYZED IN ACCORDANCE WITH TESTING PROCEDURES OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY OR BY THE APPLICATION OF KNOWLEDGE OF THE PROCESS GENERATING THE WASTE.																																																			
SIGNATURE <u>[Signature]</u>		TITLE <u>ENV ENGR</u> DATE <u>12/27/99</u>																																																	

HO 26843-52



Professional Service Industries, Inc.

ANALYTICAL REPORT

TESTED FOR: GATX TERMINALS
Post Office Box 486
Galena Park, TX 77547

PROJECT: Chemical Analysis

ATTN: Lynn R. Jones

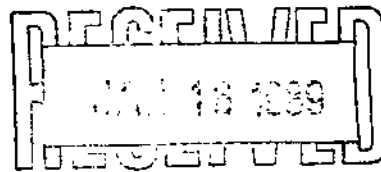
DATE: January 10, 1989

OUR REPORT NO 213-83087-03

REMARKS: Date Received: December 28, 1988
Sample Identification: Two samples labeled below.
Methodology Employed: SW 846/Standard Methods, 16th Edition

TEST RESULTS:

	<u>Results</u>	<u>Method #</u>	<u>Performed by</u>
Sample ID: PD-1 P16 Drum 12/12/88-12/28/88			
TOC, mg/kg as received basis	3010	505 A	AF 1/3/89, 0850
Sample ID: RCW-1			
TOC, mg/kg as received basis	2258	505 A	AF 1/3/89, 0850



GATX

213-83087-03

Page 2

Sample ID: PD-1 P16 Drum 12/12/88-12/28/88

SW 8240 Volatile Compound

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
Chloromethane	BRL	0.3
Bromomethane	BRL	0.3
Vinyl chloride	BRL	0.3
Chloroethane	BRL	0.3
Dichloromethane	BRL	0.3
Acetone	BRL	3.0
Carbon disulfide	BRL	0.3
1,1-Dichloroethene	BRL	0.3
1,1-Dichloroethane	BRL	0.3
2-Butanone	BRL	0.3
Trans-1,2-dichloroethene	BRL	0.3
Chloroform	BRL	0.3
1,2-Dichloroethane	BRL	0.3
1,1,1-Trichloroethane	0.5	0.3
Carbon tetrachloride	BRL	0.3
Bromodichloromethane	BRL	0.3
1,2-Dichloropropane	BRL	0.3
Vinyl acetate	BRL	0.3
Cis-1,3-dichloropropene	BRL	0.3
Trichloroethene	BRL	0.3
Dibromochloromethane	BRL	0.3
1,1,2-Trichloroethane	BRL	0.3
Benzene	100	0.3
Trans-1,3-dichloropropane	BRL	0.3
2-Chloroethylvinylether	BRL	0.3
Bromoform	BRL	0.3
2-Hexanone	BRL	0.3
4-Methyl-2-pentanone	BRL	0.3
Tetrachloroethene	BRL	0.3
1,1,2,2-Tetrachloroethane	BRL	0.3
Toluene	300	0.3
Chlorobenzene	BRL	0.3
Ethylbenzene	300	0.3
Styrene	BRL	0.3
Total xylenes	5000	0.3
1,2-Dichlorobenzene	BRL	0.3
1,3-Dichlorobenzene	BRL	0.3
1,4-Dichlorobenzene	BRL	0.3

BDL = Below Reporting Limit

Surrogate recoveries, %

1,2-Dichloroethane-d4	88.0
Toluene-d8	90.0
Bromofluorobenzene	100.0

GATX
 213-83087-03
 Page 3
 Sample ID: PD-1 P16 Drum 12/12/88-12/28/88

SW 8270 Base-Neutal and Acid Extractable Compounds

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
Phenol	BRL	0.66
Bis(2-chloroethyl)ether	BRL	0.66
2-Chlorophenol	BRL	0.66
1,3-Dichlorobenzene	BRL	0.66
1,4-Dichlorobenzene	BRL	0.66
Benzyl alcohol	BRL	1.30
1,2-Dichlorobenzene	BRL	0.66
2-Methylphenol	BRL	0.66
Bis(2-chloroisopropyl)ether	BRL	0.66
4-Methylphenol	BRL	0.66
N-Nitrosodi-N-propylamine	BRL	0.66
Hexachloroethane	BRL	0.66
Nitrobenzene	BRL	0.66
Isophorone	BRL	0.66
2-Nitrophenol	BRL	0.66
2,4-Dimethylphenol	BRL	0.66
Benzoic acid	BRL	3.30
Bis(2-chloroethoxy)methane	BRL	0.66
2,4-Dichlorophenol	BRL	0.66
1,2,4-Trichlorobenzene	BRL	0.66
Naphthalene	BRL	0.66
4-Chloroaniline	BRL	1.30
Hexachlorobutadiene	BRL	0.66
4-Chloro-3-methylphenol	BRL	0.66
2-Methylnaphthalene	57	0.66
Hexachlorocyclopentadiene	BRL	0.66
2,4,6-Trichlorophenol	BRL	0.66
2,4,5-Trichlorophenol	BRL	0.66
2-Chloronaphthalene	BRL	0.66
2-Nitroaniline	BRL	3.30
Dimethylphthalate	BRL	0.66
Acenaphthylene	BRL	0.66
3-Nitroaniline	BRL	3.30
Acenaphthene	BRL	0.66
2,4-Dinitrophenol	BRL	3.30
4-Nitrophenol	BRL	0.66
Dibenzofuran	BRL	0.66
2,4-Dinitrotoluene	BRL	0.66
2,6-Dinitrotoluene	BRL	0.66
Diethylphthalate	BRL	0.66

-Continued-

SW 8270 Base-Neutral and Acid Extractable Compounds
(Continued)

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
4-Chlorophenyl-phenylether	BRL	0.66
Fluorene	BRL	0.66
4-Nitroaniline	8.5	3.30
4,6-Dinitro-2-methylphenol	BRL	3.30
N-Nitrosodiphenylamine	BRL	0.66
4-Bromophenyl-phenylether	BRL	0.66
Hexachlorobenzene	BRL	0.66
Pentachlorophenol	BRL	3.30
Phenanthrene	100	0.66
Anthracene	BRL	0.66
Di-n-butylphthalate	BRL	0.66
Fluoroanthene	360	0.66
Pyrene	270	0.66
Benzylbutylphthalate	BRL	0.66
3,3'-Dichlorobenzidine	BRL	1.30
Benzo(a)anthracene	86	0.66
Bis(2-ethylhexyl)phthalate	900	0.66
Chrysene	290	0.66
Di-n-octylphthalate	15	0.66
Benzo(b)fluoranthene	160	0.66
Benzo(k)fluoroanthene	BRL	0.66
Benzo(a)pyrene	93	0.66
Indeno(1,2,3-cd)pyrene	89	0.66
Dibenzo(a,h)anthracene	BRL	0.66
Benzo(g,h,i)perylene	77	0.66

BRL = Below Reporting Limit

GATX
 213-83087-03
 Page 5
 Sample ID: RCW-1

SW 8240 Volatile Compound

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
Chloromethane	BRL	0.3
Bromomethane	BRL	0.3
Vinyl chloride	BRL	0.3
Chloroethane	BRL	0.3
Dichloromethane	BRL	0.3
Acetone	BRL	3.0
Carbon disulfide	BRL	0.3
1,1-Dichloroethene	BRL	0.3
1,1-Dichloroethane	BRL	0.3
2-Butanone	BRL	0.3
Trans-1,2-dichloroethene	BRL	0.3
Chloroform	BRL	0.3
1,2-Dichloroethane	1	0.3
1,1,1-Trichloroethane	BRL	0.3
Carbon tetrachloride	0.7	0.3
Bromodichloromethane	BRL	0.3
1,2-Dichloropropane	BRL	0.3
Vinyl acetate	BRL	0.3
Cis-1,3-dichloropropene	BRL	0.3
Trichloroethene	0.3	0.3
Dibromochloromethane	BRL	0.3
1,1,2-Trichloroethane	**	0.3
Benzene	200	0.3
Trans-1,3-dichloropropane	BRL	0.3
2-Chloroethylvinylether	BRL	0.3
Bromoform	BRL	0.3
2-Hexanone	BRL	0.3
4-Methyl-2-pentanone	BRL	0.3
Tetrachloroethene	6	0.3
1,1,2,2-Tetrachloroethane	1	0.3
Toluene	40	0.3
Chlorobenzene	BRL	0.3
Ethylbenzene	20	0.3
Styrene	8	0.3
Total xylenes	40	0.3
1,2-Dichlorobenzene	BRL	0.3
1,3-Dichlorobenzene	BRL	0.3
1,4-Dichlorobenzene	BRL	0.3

BDL = Below Reporting Limit

Surrogate recoveries, %

1,2-Dichloroethane-d4	88.0
Toluene-d8	91.0
Bromofluorobenzene	107.0

GATX
 213-83087-03
 Page 6
 Sample ID: RCW-1

SW 8270 Base-Neutal and Acid Extractable Compounds

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
Phenol	3.8	0.66
Bis(2-chloroethyl)ether	BRL	0.66
2-Chlorophenol	BRL	0.66
1,3-Dichlorobenzene	BRL	0.66
1,4-Dichlorobenzene	BRL	0.66
Benzyl alcohol	**	1.30
1,2-Dichlorobenzene	BRL	0.66
2-Methylphenol	23	0.66
Bis(2-chloroisopropyl)ether	BRL	0.66
4-Methylphenol	71	0.66
N-Nitrosodi-N-propylamine	BRL	0.66
Hexachloroethane	BRL	0.66
Nitrobenzene	**	0.66
Isophorone	BRL	0.66
2-Nitrophenol	BRL	0.66
2,4-Dimethylphenol	12	0.66
Benzoic acid	BRL	3.30
Bis(2-chloroethoxy)methane	BRL	0.66
2,4-Dichlorophenol	BRL	0.66
1,2,4-Trichlorobenzene	BRL	0.66
Naphthalene	30	0.66
4-Chloroaniline	BRL	1.30
Hexachlorobutadiene	BRL	0.66
4-Chloro-3-methylphenol	BRL	0.66
2-Methylnaphthalene	17	0.66
Hexachlorocyclopentadiene	BRL	0.66
2,4,6-Trichlorophenol	BRL	0.66
2,4,5-Trichlorophenol	BRL	0.66
2-Chloronaphthalene	BRL	0.66
2-Nitroaniline	BRL	3.30
Dimethylphthalate	BRL	0.66
Acenaphthylene	**	0.66
3-Nitroaniline	BRL	3.30
Acenaphthene	10	0.66
2,4-Dinitrophenol	**	3.30
4-Nitrophenol	BRL	0.66
Dibenzofuran	9.2	0.66
2,4-Dinitrotoluene	BRL	0.66
2,6-Dinitrotoluene	BRL	0.66
Diethylphthalate	BRL	0.66

-Continued-

SW 8270 Base-Neutral and Acid Extractable Compounds
(Continued)

<u>Compound Name</u>	<u>Concentration ppm, (mg/kg)</u>	<u>Reporting Limit ppm, (mg/kg)</u>
4-Chlorophenyl-phenylether	BRL	0.66
Fluorene	9.1	0.66
4-Nitroaniline	BRL	3.30
4,6-Dinitro-2-methylphenol	**	3.30
N-Nitrosodiphenylamine	BRL	0.66
4-Bromophenyl-phenylether	BRL	0.66
Hexachlorobenzene	BRL	0.66
Pentachlorophenol	BRL	3.30
Phenanthrene	24	0.66
Anthracene	5.3	0.66
Di-n-butylphthalate	1.0	0.66
Fluoroanthene	13	0.66
Pyrene	6.9	0.66
Benzylbutylphthalate	BRL	0.66
3,3'-Dichlorobenzidine	BRL	1.30
Benzo(a)anthracene	1.2	0.66
Bis(2-ethylhexyl)phthalate	BRL	0.66
Chrysene	2.2	0.66
Di-n-octylphthalate	BRL	0.66
Benzo(b)fluoranthene	0.7	0.66
Benzo(k)fluoroanthene	BRL	0.66
Benzo(a)pyrene	93	0.66
Indeno(1,2,3-cd)pyrene	89	0.66
Dibenzo(a,h)anthracene	BRL	0.66
Benzo(g,h,i)perylene	77	0.66

BRL = Below Reporting Limit

TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman
Paul Hopkins, Commissioner
John O. Houchins, Commissioner



Allen Beinke, Executive Director
Michael E. Field, General Counsel
Brenda W. Foster, Chief Clerk

March 31, 1989

GATX Terminals Corp.
Galena Park, Texas

APR 3 1989

Lynn R. Jones
Gatx Terminals Corporation
Post Office Box 486
Galena Park, Texas 77547-0486

REB	BDL	TPS	
WJF	LI	SET	
DLP	NG	EJ	LAB
CMB	TCP	BJB	FILE

Re: 30 Day Extension
Texas Water Commission Registration Number 30573

Dear Mr. Jones:

This is in response to your letter of March 14, 1989 requesting a 30 day extension for the accumulation of hazardous waste on your site. According to 31 Texas Administrative Code (TAC) Section 335.69(b), the Executive Director may grant an extension up to 30 days if hazardous waste must remain on-site for longer than 90 days due to unforeseen, temporary and uncontrollable circumstances.

The Commission believes the inability by your disposal company, Rollins Environmental Services, to handle your waste within the 90 day accumulation time is a circumstance beyond your control and is a basis to grant an extension pursuant to 31 TAC 335.69(b). Please note that the additional 30 day period begins at the close of the original 90 day limit, NOT from the date of this letter. You are further advised that the Commission feels the company should explore every alternative possible to avoid any future problems of similar nature in handling and disposing of its hazardous waste.

Sincerely,

A handwritten signature in cursive script that reads "Bobby D. Whitefield".

Bobby D. Whitefield, Chief
Information & Technical Services Section
Hazardous & Solid Waste Division

JBL:cw

cc: Texas Water Commission Southeast Region - Deer Park Office



TELEPHONE MEMO
ENVIRONMENTAL ENGINEER
GALENA PARK TERMINAL

DATE 3-16-89 TIME 0930

PERSONS INVOLVED	AFFILIATION	TELEPHONE #
<u>John Cabanford</u>	<u>Tuc-Austin</u>	

SUBJECT DISCUSSED 30 Day extension
on Pipeline Pigs

DISCUSSION

DISTRIBUTION

FUTURE ACTION REQUIRED



GATX TERMINALS CORPORATION

906 CLINTON DRIVE
P.O. BOX 486
GALENA PARK, TX 77547-0486
713-455-1231

March 14, 1989

Mr. John Latchford
Texas Water Commission
P. O. Box 13087
Capitol Station
Austin, TX 78711-3087

Re: Request for 30 Day Extension of the Holding Time (less than 90 days)
for Hazardous Waste - Registration No. 30573
GATX Terminals, Galena Park

Dear Mr. Latchford:

GATX Terminals is requesting an additional 30 days of holding time for 30 fibrepack drums of waste absorbent pipeline pigs that were generated from December 19, 1988 thru March 3, 1989, in accordance with TAC 335.69.b. The TWC waste code is 981510 and the EPA waste code is D001 - Flammable Solid Waste.

Discussion

Because incineration is the best available technology for treatment and disposal, GATX Terminals undertook an agreement with Rollins Environmental Services to incinerate the waste material.

Due to delays of the incinerator facility located in Deer Park, the material was placed on a backlog list. The Rollins facility notified GATX on March 13, 1989 that the materials will not be transported to the incinerator before March 19, 1989 (i.e. 90 days from December 19, 1989).

We apologize for the short notification. Please contact us at 713-455-1231 with any questions.

Sincerely,

Lynn R. Jones
Environmental Engineer

LRJ/nro

cc: R. E. Butler
R. L. Commander
TWC - Southeast Regional Office
Attn: Mr. Bill Van Evers
File

CERTIFIED MAIL NO. P 714 663 023
RETURN RECEIPT REQUESTED



GATX TERMINALS CORPORATION

906 CLINTON DRIVE
P.O. BOX 486
GALENA PARK, TX 77547-0486
713-455-1231

March 14, 1989

Mr. John Latchford
Texas Water Commission
P. O. Box 13087
Capitol Station
Austin, TX 78711-3087

Re: Request for 30 Day Extension of the Holding Time (less than 90 days)
for Hazardous Waste - Registration No. 30573
GATX Terminals, Galena Park

Dear Mr. Latchford:

GATX Terminals is requesting an additional 30 days of holding time for 30 fibrepack drums of waste absorbent pipeline pigs that were generated from December 19, 1988 thru March 3, 1989, in accordance with TAC 335.69.b. The TWC waste code is 981510 and the EPA waste code is D001 - Flammable Solid Waste.

Discussion

Because incineration is the best available technology for treatment and disposal, GATX Terminals undertook an agreement with Rollins Environmental Services to incinerate the waste material.

Due to delays of the incinerator facility located in Deer Park, the material was placed on a backlog list. The Rollins facility notified GATX on March 13, 1989 that the materials will not be transported to the incinerator before March 19, 1989 (i.e. 90 days from December 19, 1989).

We apologize for the short notification. Please contact us at 713-455-1231 with any questions.

Sincerely,

Lynn R. Jones
Environmental Engineer

LRJ/nro
cc: R. E. Butler
R. L. Commander
TWC - Southeast Regional Office
Attn: Mr. Bill Van Evers
File

CERTIFIED MAIL NO. P 714 663 023
RETURN RECEIPT REQUESTED

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 12-31-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TX D026481523189601	Manifest Document No. 189601	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address GATX TERMINALS P.O. Box 426 Galen Park Texas 77547				A. State Manifest Document Number NO 00550040		
4. Generator's Phone 713 455 1231				B. State Generator's ID 305TB		
5. Transporter 1 Company Name CET				C. State Transporter's ID 40256		
6. US EPA ID Number WED98C918558				D. Transporter's Phone 713 455 4601		
7. Transporter 2 Company Name				E. State Transporter's ID		
8. US EPA ID Number				F. Transporter's Phone		
9. Designated Facility Name and Site Address ROLLINS ENVIRONMENTAL SERVICES (TX) 2027 BATTLEGROUND ROAD DEER PARK TX 77536				10. US EPA ID Number TX D055141378		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		
				No.	Type	13. Total Quantity
						14. Unit Wt. Vol
						15. Waste No.
a. Waste Flammable Solid N.O.S. Flammable Solid UN 1325				57	DF	3000 P
b. D001, U05, U105 etc.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above ROLLINS HO-22428-20 TWC CLASS I HAZARDOUS WASTE ABSORBANT 981510 EPA D001 - Ignitable Solid Waste				K. Handling Codes for Wastes Listed Above T-07 ✓		
15. Special Handling Instructions and Additional Information Stay upwind & Do not Touch Spilled Material. In case of fire use dry chemical foam. In case of emergency contact GATX Shift Foreman 713 455 1231						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name W.G. Simmons				Signature <i>W.G. Simmons</i>		Month Day Year 06/01/89
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name ED DEININGER				Signature <i>Ed Deinger</i>		Month Day Year 6/1/89
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name				Signature		Month Day Year
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name JOE CARROLL				Signature <i>Joe Carroll</i>		Month Day Year 06/01/89



Rollins

TO: All Generators
FROM: Marleen Dunnigan
DATE: December 19, 1988
SUBJECT: RES (TX) State Facility's ID

Rollins Environmental Services (TX) Inc. State Facility's ID has been changed. The new ID number to be shown in section G of the Uniform Hazardous Waste Manifest is 50089.

Use of the permit number 01429 should be discontinued.

If there are any questions concerning the above information, please call 713/479-6001.

Thank you,

Marleen Dunnigan
Manifest Reporting Clerk

/md

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087



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GENERATOR

TRANSPORTER

FACILITY



Info To:
ROLLINS ENVIRONMENTAL SERVICES (TX) INC
2027 BATTLEGROUND ROAD

BILL OF LADING

138054

DEER PARK TX 77536
Phone : (713) 479-0001-216
EPA Id: TX0055141378

Date : 5,
Cust. Mor: 01
Order No: 01

CONSIGNOR:

GATA TERMINALS CORP
910 S CLINTON

GALERA PARK

TX 77147

BILL TO:

GATA TERMINALS CORP
P O BOX 408
PURCHASING DEPT
GALERA PARK TX 77

Contact: LYNN JONES

Phone : (713) 455-1231-

Cust. EPA Id: TX0035423523

Item	Weight	Vol	Proper Shipping	Remarks
01	520000	20	X	WASTE FLAMMABLE SOLID COSY HCS FLAMMABLE SOLID UN 132 0001

Certification #1 - I certify that the above named materials are properly described and are in proper conditioning for transportation according to regulations of all governing bodies.

Consignor

Certification #3 - If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement "The carrier shall not make delivery of this shipment without payment of freight and all other charges."

Consignor

Certification #2 - Received the above tariffs and/or contract in effect on date

Driver

Certification #4 - Received the above de good condition except as noted.

Consignee

Scheduled Pickup Date: 6/01/89

Time: 06:00

Driver 1 :
Driver 2 :
Carrier : SET TYPE EQUIP: CAY
Placard 1: FLAMMABLE SOLID
Placard 2 :
Scale Loc:

Tractor : 1710
Trailer :
Decal :
Gross Wt:
Tare Wt :
Net Wt :
Time Arr RES :
Time Left RES :
Time Arr Cust :
Time Left Cust :
Time Return RES :
Time Left RES :
Billable Overnight Layover:
Billable Delay Hours :
BIN Spotted:
Explain Delay :
Picked up:

Accessories
Code Description

Bill

Driver Instructions:



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Form approved. OMB No. 2050-0039, exp.

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4. Generator's Phone (713) 455-1231		5. Transporter 1 Company Name Custom Environmental Transport		B. State Generator's ID 30573		
6. US EPA ID Number DE0980918-858		7. Transporter 2 Company Name		C. State Transporter's ID 40756		
8. US EPA ID Number		9. Designated Facility Name and Site Address Rollins Environmental Services 2027 Battleground Road Deer Park TX 77536		D. Transporter's Phone 713-4794		
10. US EPA ID Number		11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		E. State Transporter's ID		
12. Containers No. Type		13. Total Quantity		F. Transporter's Phone		
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441. Unit Wt./Vol		442. Waste No.		443. State Facility's ID		
444. Facility's Phone		445. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		446. Containers No. Type		
447. Total Quantity		448. Unit Wt./Vol		449. Waste No.		
450. State Facility's ID		451. Facility's Phone		452. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		
453. Containers No. Type		454. Total Quantity		455. Unit Wt./Vol		
456. Waste No.		457. State Facility's ID		458. Facility's Phone		
459. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		460. Containers No. Type		461. Total Quantity		
462. Unit Wt./Vol		463. Waste No.		464. State Facility's ID		
465. Facility's Phone		466. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		467. Containers No. Type		
468. Total Quantity		469. Unit Wt./Vol		470. Waste No.		
471. State Facility's ID		472. Facility's Phone		473. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		
474. Containers No. Type		475. Total Quantity		476. Unit Wt./Vol		
477. Waste No.		478. State Facility's ID		479. Facility's Phone		
480. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		481. Containers No. Type		482. Total Quantity		
483. Unit Wt./Vol		484. Waste No.		485. State Facility's ID		
486. Facility's Phone		487. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		488. Containers No. Type		
489. Total Quantity		490. Unit Wt./Vol		491. Waste No.		
492. State Facility's ID		493. Facility's Phone		494. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		
495. Containers No. Type		496. Total Quantity		497. Unit Wt./Vol		
498. Waste No.		499. State Facility's ID		500. Facility's Phone		

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address				A. State Manifest Document Number NO 100553528		
4. Generator's Phone ()				B. State Generator's ID 43		
5. Transporter 1 Company Name		6. US EPA ID Number		C. State Transporter's ID 407560		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone		
9. Designated Facility Name and Site Address				E. State Transporter's ID		
				F. Transporter's Phone		
10. US EPA ID Number				G. State Facility's ID		
				H. Facility's Phone		
11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
X	a.					
	b.					
	c.					
	d.					
J. Additional Descriptions for Materials Listed Above Rollins NO-22428-20 TWO CLASS 3 HAZARDOUS WASTE AS VARIANTS 9 ISIS AND TWO CLASS 3 HAZARDOUS WASTE AS VARIANTS 9 ISIS			K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Robert G. Simmons			Signature <i>[Signature]</i>		Month Day Year 11 11 88	
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature <i>[Signature]</i>		Date 11 11 88	
Printed/Typed Name Robert G. Simmons			Signature <i>[Signature]</i>		Month Day Year 11 11 88	
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature <i>[Signature]</i>		Date 11 11 88	
Printed/Typed Name			Signature		Month Day Year	
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name			Signature		Date 11 11 88	

GATX Terminals Corp.
Galena Park, Texas

APR 19 1989

April 14, 1989

REB	—	RDL	—	TPS	—	—
WS	—	<u>LJ</u>	—	SET	—	—
DLP	—	NG	—	EJ	—	LAB
CMB	—	TCP	—	BJB	—	FILE

Mr. Lynn Jones
G.A.T.X. Terminals Corporation
P. O. Box 486
Galena Park, Texas 77547-0486

RE: Polyurethane insulation
BFI Corporate Lab Approval #TX/274/890116/00921

Dear Lynn:

Attached is the landfill approval for the above referenced waste stream. Please note any pretreatment or disposal recommendations.

Thank you for allowing Browning-Ferris Industries to handle your waste disposal needs. Please feel free to contact me if I can offer further information or clarification.

Sincerely,

BROWNING-FERRIS INDUSTRIES

Laura Short

Laura Short
Landfill Sales
Houston Landfill District

LS/py
Enclosures

3323 Gulf Freeway • P.O. Box 1188 • Dickinson, Texas 77539



Phone 713-337-6700
Fax # 713-337-3582

Environmental • Petroleum • Drug Screening • Industrial Hygiene • Engineering • Asbestos Abatement • Mobil Lab • Fire Investigation

BFI INDUSTRIES
11013 OLD BEAUMONT HIGHWAY
HOUSTON, TEXAS 77074
ATTENTION: MR. GEORGE ELROD

DATE: 09/14/88
INVOICE #: 14292
CERTIFICATE #: 41301
P.O. #274-08-646

DATE OF SAMPLE: NOT INDICATED
DATE RECEIVED: 08/29/88

PROJECT NUMBER: 683

SAMPLE DESCRIPTION: # 6 TANK BOTTOM
SAMPLE LOCATION: GATX

METALS TCLP 40CFR261 =====	RESULTS =====	UNITS =====	DATE =====	TIME =====	ANALYST =====
ARSENIC	<0.02	MG/L	09/09	0900	MZ
BARIUM	<0.3	MG/L	09/07	0900	MZ
CADMIUM	<0.01	MG/L	09/06	1145	MZ
CHROMIUM	<0.1	MG/L	09/06	1400	MZ
LEAD	<0.1	MG/L	09/06	1530	MZ
MERCURY	<0.005	MG/L	09/02	1300	MZ
SELENIUM	<0.01	MG/L	09/01	1600	MZ
SILVER	<0.01	MG/L	09/06	1130	MZ

PAGE TWO

CERTIFICATE # 41301

SEMI-VOLATILES - SW 846 - METHOD 8270

ND INDICATES THE COMPOUND WAS NOT DETECTED

* - INDICATES POLYNUCLEAR HYDROCARBONS

ANALYSIS =====	DETECTION LIMIT = 10 MG/KG OR AS STATED =====	RESULTS MG/KG =====
ACENAPHTHENE		91 MG/KG
ACENAPHTHYLENE		ND
ACETOPHENONE		ND
ALDRINE		ND
ANILINE		ND
ANTHRACENE - *		ND
4-AMINOBIIPHENYL		ND
AROCLOR-1016		ND
AROCLOR-1221		ND
AROCLOR-1232		ND
AROCLOR-1242		ND
AROCLOR-1248		ND
AROCLOR-1254		ND
AROCLOR-1260		ND
BENZIDINE - *		ND
BENZOIC ACID		ND
BENZO (A) ANTHRACENE - *		ND
BENZO (B) FLUORANTHENE - *		ND
BENZO (K) FLUORANTHENE - *		ND
BENZO (G,H,I) PERYLENE - *		ND
BENZO (A) PYRENE - *		ND
BENZYL ALCOHOL		ND
ALPHA-BHC		ND
BETA-BHC		ND
GAMMA-BHC		ND
BHC (LINDANE)		ND
BIS (2-CHLOROETHOXY) METHANE		ND
BIS (2-CHLOROETHYL) ETHER		ND
BIS (2-CHLOROISOPROPYL) ETHER		ND
BIS (2-ETHYLHEXYL) PHTHALATE - *		ND
4-BROMOPHENYL PHENYL ETHER		ND
BUTYL BENZYL PHTHALATE - *		ND
CHLORDANE		ND

PAGE THREE

CERTIFICATE # 41301

ANALYSIS =====	DETECTION LIMIT = 10 MG/KG OR AS STATED =====	RESULTS MG/KG =====
4-CHLOROANILINE		ND
1-CHLORONAPHTHALENE		ND
2-CHLORONAPHTHALENE		ND
4-CHLORO-3-METHYLPHENOL		ND
2-CHLOROPHENOL		ND
4-CHLOROPHENYL PHENYL ETHER		ND
CHRYSENE - *		ND
4, 4' -DDD		ND
4, 4' -DDE		ND
4, 4' -DDT		ND
DIBENZ (A, J)ACRIDINE		ND
DEBENZ (A, H) ANTHRACENE - *		ND
DIBENZOFURAN		ND
DI-N-BUTYLPHTHALATE - *		ND
1, 3-DICHLOROBENZENE		ND
1, 4-DICHLOROBENZENE		ND
1, 2-DICHLOROBENZENE		ND
3, 3' -DICHLOROBENZIDINE - *		ND
2, 4-DICHLOROPHENOL		ND
2, 6-DICHLOROPHENOL		ND
DIELDRIN		ND
DIETHYLPHTHALATE		ND
P-DIMETHYLAMINOAZOBENZENE		ND
7, 12-DIMETHYLBENZ (A) ANTHRACENE		ND
A-.A-DIMETHYLPHENETHYLAMINE		ND
2, 4-DIMETHYLPHENOL		ND
DIMETHYLPHTHALATE		ND
2, 4-DINITROPHENOL		ND
2, 4-DINITROTOLUENE		ND
2, 6-DINITROTOLUENE		ND
DIPHENYLAMINE		ND
1, 2-DIPHENYLHYDRAZINE		ND
DI-N-OCTYL PHTHALATE - *		ND
ENDOSULFAN I		ND
ENDOSULFAN II		ND
ENDOSULFAN SULFATE		ND
ENDRIN		ND
ENDRIN ALDEHYDE		ND

PAGE FOUR

CERTIFICATE # 41301

ANALYSIS =====	DETECTION LIMIT = 10 MG/KG OR AS STATED =====	RESULTS MG/KG =====
ENDRIN KETONE ,		ND
ETHYL METHANESULFONATE		ND
FLUORANTHENE - *		ND
FLUORENE		ND
HEPTACHLOR		ND
HEPTACHLOR EPOXIDE		ND
HEXACHLOROBENZENE		ND
HEXACHLOROBUTADIENE		ND
HEXACHLOROCYCLOPENTADIENE		ND
HEXACHLOROETHANE		ND
INDENO (1,2,3-CD) PYRENE - *		ND
ISOPHORONE		ND
METHOXYCHLOR		ND
3-METHYLCHOLANTHRENE		ND
METHYL METHANESULFONATE		ND
2-METHYLNAPHTHALENE		815 MG/KG
2-METHYLPHENOL (O-CRESOL)		ND
4-METHYLPHENOL (P-CRESOL)		ND
NAPHTHALENE		883 MG/KG
1-NAPHTHYLAMINE		ND
2-NAPHTHYLAMINE		ND
2-NITROANILINE		ND
2-NITROANILINE		ND
4-NITROANILINE		ND
NITROBENZENE		ND
2-NITROPHENOL		ND
4-NITROPHENOL		ND
N-NITROSO-DI-N-BUTYLAMINE		ND
N-NITROSODIMETHYLAMINE		ND
N-NITROSODIPHENYLAMINE		ND
N-NITROSODIPROPYLAMINE		ND
N-NITROSOPIPERIDINE		ND
PENTACHLOROBENZENE		ND
PENTACHLORONITROBENZENE		ND
PENTACHLOROPHENOL		ND
PHENACETIN		ND
PHENANTHRENE		142 MG/KG

PAGE FIVE

CERTIFICATE # 41301

ANALYSIS =====	DETECTION LIMIT = 10 MG/KG OR AS STATED =====	RESULTS MG/KG =====
PHENOL		ND
2-PICOLINE		ND
PRONAMIDE		ND
PYRENE - *		59 MG/KG
1,2,4,5-TETRACHLOROBENZENE		ND
2,3,4,6-TETRACHLOROBENZENE		ND
1,2,4-TRICHLOROBENZENE		ND
2,4,5-TRICHLOROPHENOL		ND
2,4,6-TRICHLOROPHENOL		ND
TOXAPHENE		ND

VOLATILE COMPOUNDS - SW 846 - METHOD 8240

ND INDICATES THE COMPOUND WAS NOT DETECTED

ANALYSIS =====	DETECTION LIMIT = 10 MG/KG OR AS STATED =====	RESULTS MG/KG =====
ACETONE		ND
ACROLEIN		ND
ACRYLONITRILE		ND
BENZENE		484 MG/KG
BROMODICHLOROMETHANE		ND
BROMOFORM		ND
BROMOMETHANE		ND
2-BUTANONE		ND
CARBON DISULFIDE		ND
CARBON TETRACHLORIDE		ND
CHLOROBENZENE		ND
CHLORODIBROMOMETHANE		ND
CHLOROETHANE		ND
2-CHLOROETHYL VINYL ETHER		ND
CHLOROFORM		ND
CHLOROMETHANE		ND
DIBROMOMETHANE		ND

PAGE SIX

CERTIFICATE # 41301

ANALYSIS =====	DETECTION LIMIT = 10 MG/KG OR AS STATED =====	RESULTS MG/KG =====
1,4-DICHLORO-2-BUTANE		ND
DICHLORODIFLUOROMETHANE		ND
1,1-DICHLOROETHANE		ND
1,2-DICHLOROETHANE		ND
1,1-DICHLOROETHANE		ND
TRANS-1,2-DICHLOROETHANE		ND
1,2-DICHLOROPROPENE		ND
CIS-1,3-DICHLOROPROPENE		ND
TRANS-1,2-DICHLOROPROPENE		ND
ETHANOL		ND
ETHYLBENZENE		513 MG/KG
ETHYL METHACRYLATE		ND
2-HEXANONE		ND
IODOMETHANE		ND
METHYLENE CHLORIDE		ND
4-METHYL-2-PENTANONE		ND
STYRENE		ND
1,1,2,2-TETRACHLOROETHANE		ND
TETRACHLOROETHENE		ND
TOLUENE		1,440 MG/KG
1,1,1-TRICHLOROETHANE		ND
1,1,2-TRICHLOROETHANE		ND
TRICHLOROETHENE		ND
TRICHLOROFLUOROMETHANE		ND
1,2,3-TRICHLOROPROPANE		ND
VINYL ACETATE		ND
VINYL CHLORIDE		ND
XYLENE		1,170 MG/KG

QUALITY ASSURANCE: THESE ANALYSES ARE PERFORMED IN ACCORDANCE WITH EPA GUIDELINES FOR QUALITY ASSURANCE. THESE PROCEDURES INCLUDE THE FOLLOWING AS MINIMUM REQUIREMENTS: COMPARISONS AGAINST KNOWN STANDARDS IN EACH RUN, ONE IN TEN SAMPLE SPLITS, AND A QUARTERLY METHODS REVIEW AGAINST KNOWN SPIKE SAMPLES.

A P R LABORATORIES, INC.


Sammy Russo

SR/cs

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
HAZARDOUS WASTE DIVISION
P.O. BOX 44307
BATON ROUGE, LOUISIANA 70804

RECEIVED
SEP 22 1988

83759

Please print or type: (Form designed for use on elite (12-pitch) typewriter)

Form Approved. OMB No. 2050-G039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. TX D02448452304748		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address GATX TERMINALS CORP P.O. BOX 186 GALENA PARK TX 77547				A. State Manifest Document Number LA1028431			
4. Generator's Phone (713) 455 1231				B. State Generator's ID 30573			
5. Transporter 1 Company Name CHEMICAL WASTE MANAGEMENT				C. State Transporter's ID 40526			
6. US EPA ID Number 144009920248				D. Transporter's Phone 713 427 6772			
7. Transporter 2 Company Name				E. State Transporter's ID			
8. US EPA ID Number				F. Transporter's Phone			
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT RT 2 JOHN BRANNON ROAD CARLYSS LA 70663				G. State Facility's ID 20022			
10. US EPA ID Number 1440000777201				H. Facility's Phone 318 583 2169			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	
				No. Type		Unit Wt/Vol	
a. WASTE FLAMMABLE SOLID N.O.S. FLAMMABLE SOLID UN 1325				18 DF		940 P	
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above CWM REFERENCE NO G44135 TEXAS WASTE CODE 981510, ABSORBANT WASTE				K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information 1) STAY UPWIND AND DO NOT TOUCH SPILLED MATERIAL 2) IN CASE OF FIRE USE DRY CHEMICAL, FOAM OR WATER SPRAY 3) IN CASE OF EMERGENCY CALL GATX SHIFT FOREMAN AT 713 455 1231							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimize the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name WAYNE G. SIMMONS				Signature <i>Wayne G. Simmons</i>		Month Day Year 09 13 88	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Jesse L Brown Jr</i>		Month Day Year 09 13 88	
Printed/Typed Name Jesse L Brown Jr				Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Month Day Year	
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.							
Printed/Typed Name Sharon Kille				Signature <i>Sharon Kille</i>		Month Day Year 09 13 88	



Professional Service Industries, Inc.

ANALYTICAL REPORT

Tested For: GATX TERMINALS
Post Office Box 486
Galena Park, TX 77547

Project: Pipeline Pig Analysis
P.O. #6214

ATTN: Lynn R. Jones

Date: April 20, 1989

Report # 214-63069-82 Addendum II

Date Received: March 30, 1989

Sample Identification: One sample labeled Pipeline Pig 3/30/89.

Methodology Employed: SW 846/Standard Methods, 16th Edition

	<u>Results</u>	<u>Method #</u>	<u>Performed by</u>
TOC, mg/kg	1,200	505 A	AF 3/31/89, 1150
Total Antimony, mg/kg	<0.50	304	RS 4/5/89, 1000
Total Beryllium, mg/kg	<1.00	305	SM 4/3/89, 1436
Total Copper, mg/kg	9.03	303	TS 4/3/89, 1100
Total Nickel, mg/kg	<0.50	303	TS 4/3/89, 1500
Total Thallium, mg/kg	<0.50	304	TS 4/6/89, 1330
Total Zinc, mg/kg	37.6	303	TS 4/4/89, 1100
Total Arsenic, mg/kg	<0.50	304	TS 4/3/89, 0930
Total Barium, mg/kg	<1.00	305	SM 4/3/89, 1201
Total Cadmium, mg/kg	1.91	303	RS 4/6/89, 0930
Total Chromium, mg/kg	<1.00	303	TS 4/5/89, 1400
Total Lead, mg/kg	1.60	304	RS 4/4/89, 1200
Total Mercury, mg/kg	0.27	303	RS 3/31/89, 1200
Total Selenium mg/kg	<0.50	304	RS 4/4/89, 1100
Total Silver, mg/kg	1.43	303	RS 4/3/89, 0800
Total Manganese, mg/kg	18.5	303	TS 4/3/89, 1300
Total Potassium, mg/kg	26.1	303	RS 4/7/89, 0900
Total Silicon, mg/kg	353	305	SM 4/3/89, 1030
Total Sodium, mg/kg	74.2	303	RS 4/7/89, 1000

-continued-

SW 8240 VOLATILE COMPOUNDS

<u>Compound Name</u>	<u>Concentration</u> <u>ppm, (mg/kg)</u>	<u>Reporting Limit</u> <u>ppm, (mg/kg)</u>
Chloromethane	BRL	0.3
Bromomethane	BRL	0.3
Vinyl chloride	BRL	0.3
Chloroethane	BRL	0.3
Dichloromethane	BRL	0.3
Acetone	BRL	3.0
Carbon disulfide	BRL	0.3
1,1-Dichloroethene	BRL	0.3
1,1-Dichloroethane	BRL	0.3
2-Butanone	BRL	0.3
Trans-1,2-dichloroethene	BRL	0.3
Chloroform	BRL	0.3
1,2-Dichloroethane	BRL	0.3
1,1,1-Trichloroethane	BRL	0.3
Carbon tetrachloride	BRL	0.3
Bromodichloromethane	BRL	0.3
1,2-Dichloropropane	BRL	0.3
Vinyl acetate	BRL	0.3
Cis-1,3-dichloropropene	BRL	0.3
Trichloroethene	BRL	0.3
Dibromochloromethane	BRL	0.3
1,1,2-Trichloroethane	BRL	0.3
Benzene	BRL	0.3
Trans-1,3-dichloropropane	BRL	0.3
2-Chloroethylvinylether	BRL	0.3
Bromoform	BRL	0.3
2-Hexanone	BRL	0.3
4-Methyl-2-pentanone	BRL	0.3
Tetrachloroethene	BRL	0.3
1,1,2,2-Tetrachloroethane	BRL	0.3
Toluene	BRL	0.3
Chlorobenzene	BRL	0.3
Ethylbenzene	BRL	0.3
Styrene	BRL	0.3
Total xylenes	BRL	0.3
1,2-Dichlorobenzene	BRL	0.3
1,3-Dichlorobenzene	BRL	0.3
1,4-Dichlorobenzene	BRL	0.3

BDL = Below Reporting Limit

Date analyzed: 3/31/89

SW 8240

<u>Compound</u>	<u>Concentration</u> <u>ppm, mg/kg</u>	<u>Reporting Limit</u> <u>ppm, mg/kg</u>
Acrolein	BRL	10
Acrylonitrile	BRL	10
Dibromomethane	BRL	10
1,4-Dichloro-2-butane	BRL	10
Dichlorodifluoromethane	BRL	10
Ethanol	BRL	10
Ethyl methacrylate	BRL	10
Iodomethane	BRL	10
Trichlorofluoromethane	BRL	10

Surrogate Recoveries, %

1,2-Dichloroethane-d4	137
Toluene-d8	90
Bromofluorobenzene	113

Internal Standard, ppm

1,4-Difluorobenzene	40
Chlorobenzene-d5	40

Date analyzed: 3/31/89

SW 8270 Base-Neutral and Acid Extractable Compounds

<u>Compound Name</u>	<u>Concentration ppm. (mg/kg)</u>	<u>Reporting Limit ppm. (mg/kg)</u>
Phenol	BRL	0.66
Bis(2-chloroethyl)ether	BRL	0.66
2-Chlorophenol	BRL	0.66
1,3-Dichlorobenzene	BRL	0.66
1,4-Dichlorobenzene	BRL	0.66
Benzyl alcohol	BRL	1.30
1,2-Dichlorobenzene	BRL	0.66
2-Methylphenol	BRL	0.66
Bis(2-chloroisopropyl)ether	BRL	0.66
4-Methylphenol	BRL	0.66
N-Nitrosodi-N-propylamine	BRL	0.66
Hexachloroethane	BRL	0.66
Nitrobenzene	BRL	0.66
Isophorone	BRL	0.66
2-Nitrophenol	BRL	0.66
2,4-Dimethylphenol	BRL	0.66
Benzoic acid	BRL	3.30
Bis(2-chloroethoxy)methane	BRL	0.66
2,4-Dichlorophenol	BRL	0.66
1,2,4-Trichlorobenzene	BRL	0.66
Naphthalene	1100	0.66
4-Chloroaniline	BRL	1.30
Hexachlorobutadiene	BRL	0.66
4-Chloro-3-methylphenol	BRL	0.66
2-Methylnaphthalene	500	0.66
Hexachlorocyclopentadiene	BRL	0.66
2,4,6-Trichlorophenol	BRL	0.66
2,4,5-Trichlorophenol	BRL	0.66
2-Chloronaphthalene	BRL	0.66
2-Nitroaniline	BRL	3.30
Dimethylphthalate	BRL	0.66
Acenaphthylene	4.6	0.66
3-Nitroaniline	BRL	3.30
Acenaphthene	BRL	0.66
2,4-Dinitrophenol	BRL	3.30
4-Nitrophenol	BRL	0.66
Dibenzofuran	BRL	0.66
2,4-Dinitrotoluene	9.0	0.66
2,6-Dinitrotoluene	BRL	0.66
Diethylphthalate	BRL	0.66

-Continued-

SW 8270 Base-Neutral and Acid Extractable Compounds
(Continued)

<u>Compound Name</u>	<u>Concentration</u> <u>ppm. (mg/kg)</u>	<u>Reporting Limit</u> <u>ppm. (mg/kg)</u>
4-Chlorophenyl-phenylether	BRL	0.66
Fluorene	63	0.66
4-Nitroaniline	BRL	3.30
4,6-Dinitro-2-methylphenol	BRL	3.30
N-Nitrosodiphenylamine	BRL	0.66
4-Bromophenyl-phenylether	BRL	0.66
Hexachlorobenzene	BRL	0.66
Pentachlorophenol	BRL	3.30
Phenanthrene	66	0.66
Anthracene	9.5	0.66
Di-n-butylphthalate	1.6	0.66
Fluoroanthene	13	0.66
Pyrene	31	0.66
Benzylbutylphthalate	2.7	0.66
3,3'-Dichlorobenzidine	BRL	1.30
Benzo(a)anthracene	3.8	0.66
Bis(2-ethylhexyl)phthalate	820	0.66
Chrysene	6.1	0.66
Di-n-octylphthalate	35	0.66
Benzo(b)fluoranthene	BRL	0.66
Benzo(k)fluroanthene	BRL	0.66
Benzo(a)pyrene	3.1	0.66
Indeno(1,2,3-cd)pyrene	BRL	0.66
Dibenzo(a,h)anthracene	BRL	0.66
Benzo(g,h,i)perylene	10	0.66

BRL = Below Reporting Limit

Date analyzed: 3/31/89

SW 8270

<u>Compound</u>	<u>Concentration</u>	<u>Reporting Limit</u>
	<u>ppm, mg/kg</u>	<u>ppm, mg/kg</u>
Acetophenone	BRL	10
Aldrin	BRL	10
Aniline	BRL	10
4-Aminobiphenyl	BRL	10
Arochlor-1016	BRL	10
Arochlor-1221	BRL	10
Arochlor-1232	BRL	10
Arochlor-1242	BRL	10
Arochlor-1248	BRL	10
Arochlor-1254	BRL	10
Arochlor-1260	BRL	10
Benzidine	BRL	10
alpha-BHC	BRL	10
beta-BHC	BRL	10
gamma-BHC	BRL	10
delta-BHC(Lindane)	BRL	10
Chlordane	BRL	10
1-Chloronaphthalene	BRL	10
4,4'-DDD	BRL	10
4,4'-DDE	BRL	10
4,4'-DDT	BRL	10
Dibenz(a,j)acridine	BRL	10
2,6-Dichlorophenol	BRL	10
Dieldrin	BRL	10
p-Dimethylaminoazobenzene	BRL	10
7,12-Dimethylbenz(a)anthracene	BRL	10
alpha,alpha-Dimethylphenethylamine	BRL	10
Diphenylamine	BRL	10
1,2-Diphenylhydrazine	BRL	10
Endosulfan I	BRL	10
Endosulfan II	BRL	10
Endosulfan sulfate	BRL	10
Endrin	BRL	10
Endrin aldehyde	BRL	10
Endrin ketone	BRL	10
Ethyl methanesulfonate	BRL	10
Heptachlor	BRL	10
Heptachlor epoxide	BRL	10
Methoxychlor	BRL	10
3-Methylcholanthrene	BRL	10
Methyl methanesulfonate	BRL	10

Date analyzed: 3/31/89

SW 8270
(continued)

<u>Compound</u>	<u>Concentration</u>	<u>Reporting Limit</u>
	<u>ppm, mg/kg</u>	<u>ppm, mg/kg</u>
1-Naphthylamine	BRL	10
2-Naphthylamine	BRL	10
N-Nitroso-di-n-butylamine	BRL	10
N-Nitrosodimethylamine	BRL	10
N-Nitrosopiperidine	BRL	10
Pentachlorobenzene	BRL	10
Pentachloronitrobenzene	BRL	10
Phenacetin	BRL	10
2-Picoline	BRL	10
Pronamide	BRL	10
1,2,4,5-Tetrachlorobenzene	BRL	10
2,3,4,6-Tetrachlorophenol	BRL	10
Toxaphene	BRL	10

Surrogate Recoveries, %

Nitrobenzene	83
2-Fluorobiphenyl	98
Terphenyl-d14	81

Internal Standard, ppm

1,4-Dichlorobenzene-d4	40
Naphthalene-d8	40

DATA REVIEW AND CERTIFICATION

The information given in this analytical report has been reviewed and is certified to have been prepared according to the methods cited herein.

Michelle R. Waller

4/21/89

Respectfully submitted,

PROFESSIONAL SERVICE INDUSTRIES, INC.



ROLLINS ENVIRONMENTAL SERVICES
UNIFORM WASTE DATA SHEET
(SCHEDULE A)



(SHADED AREAS FOR RES USE ONLY)

DOC. NO. _____ RES SALES EXEC: # _____ STREAM NO. _____
SAMPLE NO. _____ CONTRACT NO. _____

A. GENERATOR INFORMATION

1. Generator Name: CATX Terminals
2. Technical Contact: Lynne Jones (Title) _____ 3. Phone No. 455 1231
4. Emergency Contact: Shift Foreman (Title) _____ 5. Phone No. 455 1231
6. Generator USEPA ID.: TXD026481523
7. Generator State ID.: 30573
8. Disposal State ID.: 01429

B. PICK UP LOCATION

1. Company Name: CATX Terminals
2. Address: 906 East Clinton
3. City: Galena Park 4. State: Texas 5. Zip Code: 77547
6. Pickup Contact: Lynne Jones (Title) _____ 7. Phone No. _____

C. MANIFEST INFORMATION

1. Company Name: CATX Terminals
2. Address: 906 East Clinton P.O. Box 486
3. City: Galena Park 4. State: Texas 5. Zip Code: 77547
6. Manifest Contact: Lynne Jones (Title) _____ 7. Phone No. 455 1231

D. INVOICE INFORMATION

1. Company Name: CATX Terminals
2. Address: Absorbant Hydrocarbon Contaminant
3. City: P.O. Box 486
4. State: Texas 5. Zip Code: 77547
6. Invoice Contact: Nita Gresham (Title) _____ 7. Phone No. 455 1231

E. GENERAL WASTE DESCRIPTION

1. Name of Waste: Absorbant Hydrocarbon Contaminant
2. Process Generating Waste: Pipeline Cleaning Pigs
3. Quantity Generated: 25 drums (30 gallon) Per month (Year/Month)

F. SHIPPING INFORMATION

Yes No

- ☒ ☐ 1. EPA RCRA Hazardous Material
☒ ☐ 3. Disposal State Regulated Material
☒ ☐ 4. DOT Regulated Material

2. EPA Hazardous Waste Number(s):

D001, U165, U105, P056, U069
U028, U050, U107, U022

5. State Waste Number: Generating State: Texas Disposal State: Texas

6. Proper DOT Shipping Name: WASTE FLAMMABLE SOLID, N.O.S.

7. DOT Hazard Class: FLAMMABLE 8. DOT UN/NA No.: 461325 9. RQ (lbs) 10

G. METHOD OF SHIPMENT

1. ☐ Drums: Type/Size: 30 gallon 2. ☐ Bulk: Type/Size: _____
3. ☐ Other (Please be specific): _____
4. ☐ Transportation Requirements: _____

Stream No. _____

H. REGULATORY COMPLIANCE

Yes No

- ☐ ☒ 1. OSHA Listed Compounds

Specify: _____

- ☐ ☒ 2. Radioactive Material

- ☐ ☒ 3. PCB: ☐ < 50 ppm
☐ 50 - 500 ppm
☐ > 500 ppm

- ☐ ☒ 4. Biomedical Waste

- ☐ ☒ 5. FIFRA: Pesticides Specific
 Disposal Requirements

- ☐ ☒ 6. Asbestos

Yes No

- ☒ ☐ 7. Benzene

- ☐ ☒ 8. California List Regulated Waste

- ☐ ☒ 9. Solvent Regulated Waste

- ☐ ☒ 10. Dioxin Regulated Waste
 (F020, F021, F022, F023, F026, F027, F028)

- ☒ ☐ 11. First One Third Regulated Waste

- ☒ ☐ 12. Second One Third Regulated Waste

- ☒ ☐ 13. Third One Third Regulated Waste

I. CHEMICAL COMPOSITION* (must add up to 100%)

1.

Chemical Name	Concentration (est)	CASRN	RQ(LBS.)
Pipeline Pig	90-100		N/A
Rust	0-2		N/A
Chemicals - See GC/MS	0-10		10
Napthalene	1100 ppm		
Acenaphthylene	4.6 ppm		
2,4 Dinitro toluene	9.0 ppm		
Fluorene	63 ppm		
Phenanthrene	66 ppm		
Anthracene	9.5 ppm		
Fluoranthene	13 ppm		
Pyrene	31 ppm		

*PLEASE ATTACH ADDITIONAL SHEETS AS REQUIRED.

see GC/MS

J. PROPERTIES OF WASTE

1. Color: White to Dark 2. Odor: Strong
3. Ignitability (Flash Point): < 140 °F
4. Corrosivity pH: 6-9
5. Melting Point: N/A °F
6. Boiling Point: N/A °F
7. TOC: 1200 mg/l
8. TOX: < 1000 mg/l
9. Viscosity: > 1150 CPS @ 25°C
10. Vapor Pressure: 0.5 - 15 PSIG mmHg @ 100°F
11. Bromine: 0 %
12. Iodine: 0 %
13. Fluorine: 0 %
14. Cyanide: 0 %
15. Sulfur: 0 %

Yes No

16. Flowable @ 25°C ☐ ☒

17. Physical State @ 25°C (68°F):

- ☐ Powder ☒ Solid
- ☐ Gas _____ % Solid
- ☐ Sludge or Semisolid ☐ Single Phase
- ☐ Liquid ☐ Multilayered
- ☐ Other _____

18. Heat of Combustion: 13510 BTU/lb.

19. Ash: 0.7 %

20. Sulfur _____ lb.NaOH/lb.

21. Specific Gravity/Bulk Density: 0.40

22. Chlorine 2.2 %

K. REACTIVE CHARACTERISTICS

Yes	No	Yes	No	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	5. Air Reactive
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	6. Reactive Cyanide: _____ %
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	7. Reactive Sulfide _____ %
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	8. Oxidizer: _____
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	9. Other _____
<input type="checkbox"/>	<input checked="" type="checkbox"/>			1. Explosive
<input type="checkbox"/>	<input checked="" type="checkbox"/>			2. Pyrophoric
<input type="checkbox"/>	<input checked="" type="checkbox"/>			3. Shock Sensitive
<input type="checkbox"/>	<input checked="" type="checkbox"/>			4. Water Reactive

L. ELEMENTAL ANALYSIS (Total Metals required for incinerable waste;
 TCLP or EpTox Metals required for landfill waste.)

	Total/Units		Total/Units	TCLP or EpTox/ Units
1. Antimony	<u>40.50 / mg/kg</u>	7. Arsenic	<u>40.50 / mg/kg</u>	<u>1</u>
2. Beryllium	<u>41.00 / mg/kg</u>	8. Barium	<u>41.00 / mg/kg</u>	<u>1</u>
3. Copper	<u>9.03 / mg/kg</u>	9. Cadmium	<u>1.91 / mg/kg</u>	<u>1</u>
4. Nickel	<u>40.50 / mg/kg</u>	10. Chromium	<u>41.00 / mg/kg</u>	<u>1</u>
5. Thallium	<u>40.50 / mg/kg</u>	11. Lead	<u>1.60 / mg/kg</u>	<u>1</u>
6. Zinc	<u>37.6 / mg/kg</u>	12. Mercury	<u>0.27 / mg/kg</u>	<u>1</u>
		13. Selenium	<u>40.50 / mg/kg</u>	<u>1</u>
		14. Silver	<u>1.43 / mg/kg</u>	<u>1</u>

Additional Requirements for RES (TX) Inc.:

15. Manganese	<u>18.5 / mg/kg</u>	17. Silicon	<u>353 / mg/kg</u>
16. Potassium	<u>26.1 / mg/kg</u>	18. Sodium	<u>74.2 / mg/kg</u>

Additional Requirements for RES (NJ) Inc.:

19. Molybdenum	<u>1</u>	20. Vanadium	<u>1</u>
----------------	----------	--------------	----------

M. TCLP ORGANICS

9.0 ppm 2,4 Dinitrophenol (see GC/MS)

N. DISPOSAL CERTIFICATIONS

1. Is this waste excluded from direct land disposal by land disposal regulations that are in effect on the date of this Waste Data Sheet?

☒ Yes ☐ No

If yes, describe which restriction(s) applies to this waste. (See 40CFR268 and 40CFR761.)

First Third - 4 listed waste residues

2. Under 40CFR268, can this waste be landfilled directly or chemically stabilized and landfilled? ☐ Yes ☒ No

If yes, completed RES Certification Form must be attached to each Manifest.

3. Under 40CFR268, should this waste be incinerated? ☒ Yes ☐ No

If yes, completed RES Certification Form must be attached to each manifest.

4. Additional information First Third wastes.

I hereby certify and warrant that the information supplied on this form and on any attachments or supplements represents a complete and accurate identification and description of this waste material, its constituents and its known or suspected hazards. I further certify and warrant that this information is the result of an analysis of a representative sample of the waste obtained and analyzed in accordance with testing procedures of the U.S. Environmental Protection Agency or by the application of knowledge of the process generating the waste materials.

SIGNATURE: _____

RJ
4/27/89

TITLE: _____

Environmental Eng

DATE: _____

POLYCHLORINATED BIPHENYL (PCB) ITEMS**A. LIQUIDS:**

Specify method of shipment on page 3, section G.

1. Name of Original Fluid: _____
2. Name of Solvent: _____
3. PCB Concentration: _____

B. CAPACITORS:

Specify method of shipment on page 3, section G.

1. Quantity/Pounds: _____

C. TRANSFORMERS:

Specify method of shipment on page 3, section G.

1. Dimensions: _____
2. Nameplate Gallons: _____
3. PCB Concentration: _____
4. Shipping Weight: _____
5. Ship: ☐ Full; ☐ Drained Only; ☐ Drained and Flushed

D. OTHER PCB ARTICLES:

Specify method of shipment on page 3, section G.

1. _____

ROLLINS ENVIRONMENTAL SERVICES**Corporate Office**

Rollins Environmental Services (SALES) Inc.

Mail To: One Rollins Plaza, P.O. Box 2349

Wilmington, DE 19899

Ship To: One Rollins Plaza, 2200 Concord Pike

Wilmington, DE 19803

(302) 429-2768 1-800-X-WASTES Fax (302) 479-3339

NEW JERSEY

Rollins Environmental Services (SALES) Inc.

Mail To: P.O. Box 337

Bridgeport, NJ 08014

Ship To: Rt. 322 & I-295

Bridgeport, NJ 08014

(609) 467-3105 Fax (609) 467-1040

LOUISIANA

Rollins Environmental Services (SALES) Inc.

Mail To: P.O. Box 74137

Baton Rouge, LA 70874-4137

Ship To: 13351 Scenic Highway

Baton Rouge, LA 70807

(504) 778-1242 Fax (504) 774-8580

Rollins Environmental Service of Louisiana Inc.

Mail To: Deep Well Facility, Rt 2, P.O. Box 1200

Plaquemine, LA 70764

Ship To: West Sorrell Road, Gracie Lane

Plaquemine, LA 70764

(504) 659-2434 Fax (504) 659-7840

ILLINOIS

Rollins Environmental Service (SALES) Inc.

135-C East St. Charles Road

Carol Stream, IL 60188

(312) 260-9470 Fax (312) 260-0168

TEXAS

Rollins Environmental Services (SALES) Inc.

Mail To: P.O. Box 609

Deer Park, Texas 77536-0609

Ship To: 2027 Battleground Road

Deer Park, TX 77536

(713) 479-6001 Fax (713) 479-6694

CALIFORNIA

Rollins Environmental Services (SALES) Inc.

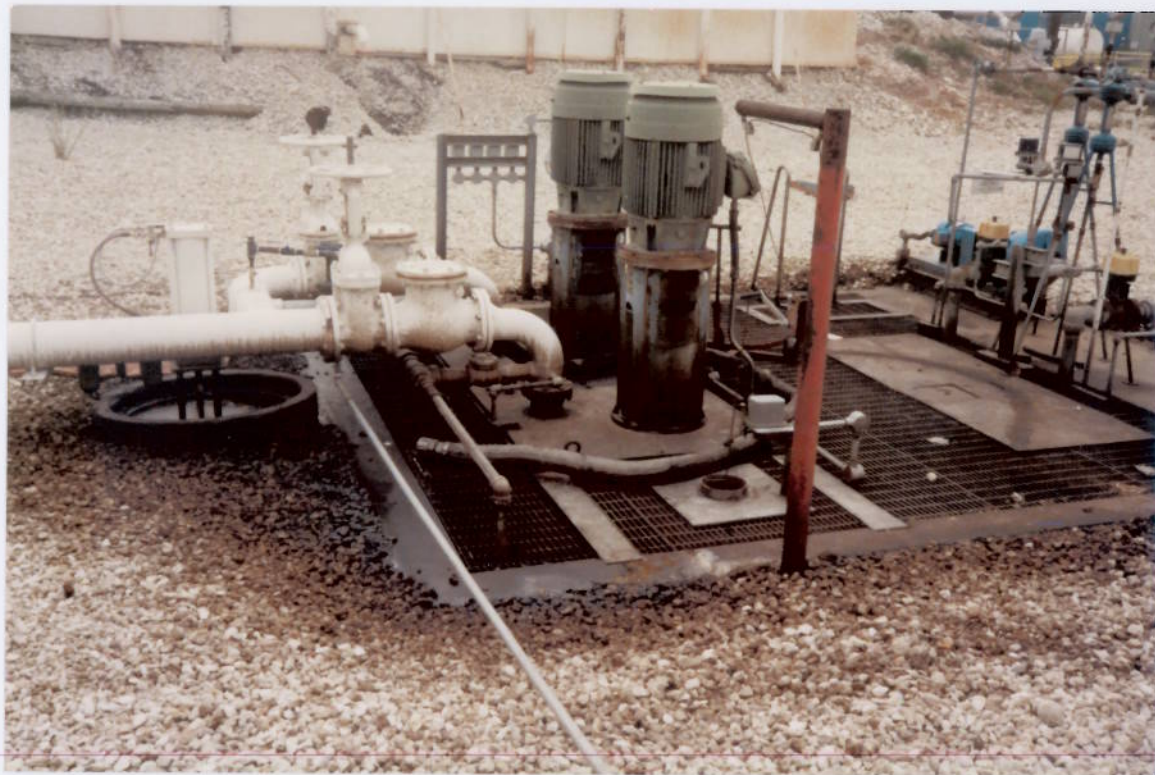
1781 Fox Drive

San Jose, CA 95131

(408) 437-9770 Fax (408) 437-0683

ATTACHMENT 2

GATX TERMINALS CORPORATION PHOTOGRAPHS



PHOTOGRAPH 1

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

Subject: Groundwater recovery system.

Time: 0935



PHOTOGRAPH 2

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

Subject: Parts washer.

Time: 1025



PHOTOGRAPH 3

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

Subject: 55-gallon drum of absorbent material on Barge Dock #2.

Time: 0945



PHOTOGRAPH 4

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

Subject: Absorbent material contained in a 55-gallon
drum at Barge Dock #2.

Time: 0945



PHOTOGRAPH 5

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

Subject: Drum storage building.

Time: 1010



PHOTOGRAPH 6

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

Subject: Empty drums (located in the drum storage building)
for reconditioning.

Time: 1020



PHOTOGRAPH 7

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

Subject: Empty drums (located in the drum storage building)
for reconditioning.

Time: 1020



PHOTOGRAPH 8

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

Subject: Hazardous waste storage area.

Time: 1015



PHOTOGRAPH 9

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

Subject: Hazardous waste storage area.

Time: 1018



PHOTOGRAPH 10

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

**Subject: Hopper of U.S. EPA Region VI
corrective action wastes.**

Time: 1000



PHOTOGRAPH 11

**OFFICIAL PHOTOGRAPH
JACOBS ENGINEERING GROUP INC.**

Subject: Hopper of U.S. EPA Region VI
corrective action wastes.

Time: 1000

ATTACHMENT 3

LAND DISPOSAL RESTRICTIONS CHECKLIST

Facility Name: GATX
EPA Id Number: TXD026481523

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form A - Restricted Waste Determination

Note: This form must be completed during all RCRA Compliance Evaluation Inspections (CEIs). Additional forms (B through F) may be required depending on types of wastes generated or handled.

Section I. Wastes restricted on November 7, 1986 (F-solvents and Dioxins)

Check each box that applies (see Appendix A):

<input checked="" type="checkbox"/> NA	F001	<input checked="" type="checkbox"/> NA	F004	<input checked="" type="checkbox"/> NA	F021	<input checked="" type="checkbox"/> NA	F026
<input type="checkbox"/>	F002	<input type="checkbox"/>	F005	<input type="checkbox"/>	F022	<input type="checkbox"/>	F027
<input type="checkbox"/>	F003 ¹	<input type="checkbox"/>	F020	<input type="checkbox"/>	F023	<input type="checkbox"/>	F028

- ☐ None of the wastes listed above are handled by the generator. Complete Section II of this form.
- ☐ One or more of the wastes listed above are handled by the generator. Complete Form C - Manifesting Restricted Wastes and Form D - Testing and Management of F-solvents and Dioxins.

¹ Applicable only if waste is ignitable.

Section II. Wastes restricted on July 8, 1987 (California List)

Check each box that applies:

- ☒ NA Liquid hazardous wastes or liquids associated with solids or sludges containing free cyanides at concentration greater than 1000 mg/L.
- ☒ NA Liquid hazardous wastes or liquids associated with solids or sludges containing one or more of the following concentrations:
- ☐ Arsenic or compounds containing arsenic greater than 500 mg/L;
 - ☐ Cadmium or compounds containing cadmium greater than 100 mg/L;

Facility Name: GATK
EPA Id Number: TX0026481527

Form A - Restricted Waste Determination (cont'd)

- ☒ Chromium or compounds containing chromium greater than 500 mg/L;
- ☐ Lead or compounds containing lead greater than 500 mg/L;
- ☐ Mercury or compounds containing mercury greater than 20 mg/L;
- ☐ Nickel or compounds containing nickel greater than 134 mg/L;
- ☐ Selenium or compounds containing selenium greater than 100 mg/L; or
- ☐ Thallium or compounds containing Thallium greater than 130 mg/L.
- ☒ Liquid hazardous wastes exhibiting a pH less than or equal to 2.0.
- ☒ Liquid hazardous wastes that also contain polychlorinated biphenols (PCBs) at concentrations between 50 to 500 mg/L.
- ☒ Liquid or nonliquid hazardous waste containing halogenated organic compounds at concentrations greater than or equal to 1000 mg/Kg.
- ☐ None of the wastes listed above are handled by the generator.
Complete Section III of this form.
- ☐ One or more of the wastes listed above are handled by the generator.
Complete Form C - Manifesting Restricted Wastes and Form E - Testing and Management of California List Wastes.

Section III. Wastes restricted on August 8, 1988 (First Third List)

1. Hard Hammer Wastes (see Appendix B)

B. All others

<input checked="" type="checkbox"/> F006 ¹	<input checked="" type="checkbox"/> K001	<input checked="" type="checkbox"/> K004 ¹	<input checked="" type="checkbox"/> K008 ¹
<input type="checkbox"/> K015	<input type="checkbox"/> K016	<input type="checkbox"/> K018	<input type="checkbox"/> K019
<input type="checkbox"/> K020	<input type="checkbox"/> K021 ¹	<input type="checkbox"/> K022 ¹	<input type="checkbox"/> K024
<input checked="" type="checkbox"/> K025 ¹	<input type="checkbox"/> K030	<input checked="" type="checkbox"/> K036 ¹	<input type="checkbox"/> K037

Facility Name: GATX
 EPA Id Number: TXD026481523

Form A - Restricted Waste Determination (cont'd)

<input checked="" type="checkbox"/> NA K044	<input checked="" type="checkbox"/> NA K045	<input checked="" type="checkbox"/> NA K046 ¹	<input checked="" type="checkbox"/> NA K047
<input type="checkbox"/> K048 ²	<input type="checkbox"/> K049 ²	<input type="checkbox"/> K050 ²	<input type="checkbox"/> K051 ²
<input type="checkbox"/> K052 ²	<input type="checkbox"/> K060 ¹	<input type="checkbox"/> K061 ¹	<input type="checkbox"/> K062
<input type="checkbox"/> K069 ¹	<input type="checkbox"/> K071	<input type="checkbox"/> K083 ¹	<input type="checkbox"/> K086 ³
<input type="checkbox"/> K087	<input type="checkbox"/> K099	<input type="checkbox"/> K100 ¹	<input type="checkbox"/> K101 ⁴
<input type="checkbox"/> K102 ⁴	<input type="checkbox"/> K103	<input type="checkbox"/> K104	↓

¹ Nonwastewaters only, wastewaters have been soft hammered.

² National Capacity Extension through May, 1990.

³ Solvent-wash subcategory, other subcategories have been soft hammered.

⁴ All wastewaters and nonwastewaters with less than 1% total As, high As wastewaters have been soft hammered.

2. Soft Hammer Wastes (see Appendix C)

A. Wastewaters only

<input checked="" type="checkbox"/> NA F006	<input checked="" type="checkbox"/> NA K004	<input checked="" type="checkbox"/> NA K008	<input checked="" type="checkbox"/> NA K021
<input type="checkbox"/> K022	<input type="checkbox"/> K025	<input type="checkbox"/> K036	<input type="checkbox"/> K046
<input type="checkbox"/> K060	<input type="checkbox"/> K061	<input type="checkbox"/> K069	<input type="checkbox"/> K083
<input type="checkbox"/> K086	<input type="checkbox"/> K100	<input type="checkbox"/> K101	<input type="checkbox"/> K102

B. All others

<input checked="" type="checkbox"/> NA F007	<input checked="" type="checkbox"/> NA F008	<input checked="" type="checkbox"/> NA F009	<input checked="" type="checkbox"/> NA F019
<input type="checkbox"/> K011	<input type="checkbox"/> K013	<input type="checkbox"/> K014	<input type="checkbox"/> K017
<input type="checkbox"/> K031	<input type="checkbox"/> K035	<input type="checkbox"/> K036	<input type="checkbox"/> K069
<input type="checkbox"/> K073	<input type="checkbox"/> K083	<input type="checkbox"/> K084	<input type="checkbox"/> K085
<input type="checkbox"/> K086	<input type="checkbox"/> K101 ¹	<input type="checkbox"/> K102 ¹	<input type="checkbox"/> K106

Facility Name: GATX
EPA Id Number: TXD026481523

Form A - Restricted Waste Determination (cont'd)

<input checked="" type="checkbox"/> P001	<input checked="" type="checkbox"/> P004	<input checked="" type="checkbox"/> P005	<input checked="" type="checkbox"/> P010
<input type="checkbox"/> P011	<input type="checkbox"/> P012	<input type="checkbox"/> P015	<input type="checkbox"/> P016
<input type="checkbox"/> P018	<input type="checkbox"/> P020	<input type="checkbox"/> P030	<input type="checkbox"/> P036
<input type="checkbox"/> P037	<input type="checkbox"/> P039	<input type="checkbox"/> P041	<input type="checkbox"/> P048
<input type="checkbox"/> P050	<input type="checkbox"/> P058	<input type="checkbox"/> P059	<input type="checkbox"/> P063
<input type="checkbox"/> P068	<input type="checkbox"/> P069	<input type="checkbox"/> P070	<input type="checkbox"/> P071
<input type="checkbox"/> P081	<input type="checkbox"/> P082	<input type="checkbox"/> P084	<input type="checkbox"/> P087
<input type="checkbox"/> P089	<input type="checkbox"/> P092	<input type="checkbox"/> P094	<input type="checkbox"/> P097
<input type="checkbox"/> P102	<input type="checkbox"/> P105	<input type="checkbox"/> P108	<input type="checkbox"/> P110
<input type="checkbox"/> P115	<input type="checkbox"/> P120	<input type="checkbox"/> P122	<input checked="" type="checkbox"/> P123
<input type="checkbox"/> U007	<input type="checkbox"/> U009	<input type="checkbox"/> U010	<input checked="" type="checkbox"/> U012
<input type="checkbox"/> U016	<input type="checkbox"/> U018	<input type="checkbox"/> U019	<input checked="" type="checkbox"/> U022
<input type="checkbox"/> U029	<input type="checkbox"/> U031	<input type="checkbox"/> U036	<input checked="" type="checkbox"/> U037
<input checked="" type="checkbox"/> U041	<input checked="" type="checkbox"/> U043	<input type="checkbox"/> U044	<input type="checkbox"/> U046
<input checked="" type="checkbox"/> U050	<input checked="" type="checkbox"/> U051	<input type="checkbox"/> U053	<input type="checkbox"/> U061
<input checked="" type="checkbox"/> U063	<input checked="" type="checkbox"/> U064	<input type="checkbox"/> U066	<input type="checkbox"/> U067
<input type="checkbox"/> U074	<input type="checkbox"/> U077	<input checked="" type="checkbox"/> U078	<input type="checkbox"/> U086
<input type="checkbox"/> U089	<input type="checkbox"/> U103	<input checked="" type="checkbox"/> U105	<input type="checkbox"/> U108
<input type="checkbox"/> U115	<input type="checkbox"/> U122	<input checked="" type="checkbox"/> U124	<input type="checkbox"/> U129
<input type="checkbox"/> U130	<input type="checkbox"/> U133	<input type="checkbox"/> U134	<input type="checkbox"/> U137
<input type="checkbox"/> U151	<input type="checkbox"/> U154	<input type="checkbox"/> U155	<input type="checkbox"/> U157
<input checked="" type="checkbox"/> U158	<input checked="" type="checkbox"/> U159	<input checked="" type="checkbox"/> U171	<input checked="" type="checkbox"/> U177

Facility Name: GATX
EPA Id Number: TXD026481523

Form A - Restricted Waste Determination (cont'd)

<input checked="" type="checkbox"/> U180	<input checked="" type="checkbox"/> U185	<input checked="" type="checkbox"/> U188	<input checked="" type="checkbox"/> U192
<input type="checkbox"/> U200	<input type="checkbox"/> U209	<input type="checkbox"/> U210	<input type="checkbox"/> U211
<input type="checkbox"/> U219	<input type="checkbox"/> U220	<input type="checkbox"/> U221	<input type="checkbox"/> U223
<input type="checkbox"/> U226	<input type="checkbox"/> U227	<input type="checkbox"/> U228	<input type="checkbox"/> U237
<input checked="" type="checkbox"/> U238	<input checked="" type="checkbox"/> U248	<input checked="" type="checkbox"/> U249	

¹ Nonwastewaters with greater than 1% As.

- ☒ None of the wastes listed above are handled by the generator.
Complete Section VI of this form.
- ☐ One or more of the wastes listed above are handled by the generator.
Complete Form C - Manifesting Restricted Wastes and Form F - Testing
and Management of First Third List Wastes.

Section IV. Wastes restricted on June 8, 1989 (Second Third)

Section V. Wastes restricted on May 8, 1990 (Last Third)

Section VI. BDAT Treatability Group - Treatment Standards Identification.

1. Does the generator mix restricted wastes which have different treatment standards? Yes ✓ No

If yes,

- A. Did the generator select the most stringent treatment standard? Yes No

Facility Name: GATX
EPA Id Number: TKD026481523

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form B - Treatment, Storage and Disposal

N/A

Note: This form should be completed only if the generator or handler stores restricted wastes onsite for greater than 90 days or operates RCRA-regulated treatment or disposal units. Small quantity generators who accumulate restricted wastes for less than 180(270) days are exempt from the following requirements.

Section I. General facility standards

1. Has the facility's waste analysis plan been revised in accordance 264.13(b)(6) or 265.13(b)(6) to reflect requirements under 268.7 ? ☐ Yes ☐ No

2. Has the facility obtained representative chemical and physical analysis of wastes and residues in accordance to 264.13 or 265.13 ? ☐ Yes ☐ No

if yes,

A. Chemical and physical analyses of F-solvents and Dioxins

i. Has testing included analyses for all F-solvent constituents ? ☐ Yes ☐ No

ii. Were all F-solvent constituents analyzed by employing the Toxicity Characteristic Leaching Procedure (TCLP) ? ☐ Yes ☐ No

B. Chemical and physical analyses of California List wastes

i. Were the following analyses conducted on California List wastes:

a. pH ? ☐ Yes ☐ No

b. Concentrations of PCBs ? ☐ Yes ☐ No

c. Concentration of Halogenated Organic Compounds ? ☐ Yes ☐ No

d. Heavy Metal concentration ? ☐ Yes ☐ No

e. Cyanide concentration ? ☐ Yes ☐ No

Facility Name: GATK
EPA Id Number: TKD026481523

Form B - Treatment, Storage and Disposal (cont'd) N/A

C. Chemical and physical analyses of First Third List Wastes

- i. Has the facility tested wastes with established treatment standards (hard hammer wastes) ? Yes No

if yes,

- a. List these wastes and the test procedures used to determine concentrations below:

3. Were these analyses conducted onsite or offsite ? _____

A. If offsite, identify lab: _____

4. Describe the frequency of sampling restricted wastes below:

Attach copy of most recent waste analysis.

Section II. Storage of Restricted Wastes

1. Have restricted wastes exceeding treatment standards been stored ? Yes No

if yes,

- A. Have all containers been clearly marked to identify contents and date(s) entering storage ? Yes No

- B. Do operating records track location, quantity, and dates that restricted wastes entered and were removed from storage ? Yes No

- C. Do records agree with container labeling ? Yes No

- D. Are restricted wastes stored for less than 1 year ? Yes No

- E. Have tanks been emptied at least once per year, and do operating records show that volumes of restricted wastes removed from tanks at least equal tank volume ? Yes No

Facility Name: GATK
EPA Id Number: TK00264PIS23

Form B - Treatment, Storage and Disposal (cont'd)

N/A

F. Have restricted wastes been stored for more than one year ? ☐ Yes ☐ No

i. If yes, can the owner/operator demonstrate that the purpose of such storage has been solely conducted for accumulating sufficient quantities of restricted wastes to facilitate proper recovery, treatment, or disposal ? ☐ Yes ☐ No

Section III. Storage or treatment in surface impoundments

1. Have restricted wastes exceeding treatment standards been placed in surface impoundments ? ☐ Yes ☐ No

A. If yes, have these wastes and their residues been removed at least annually ? ☐ Yes ☐ No

B. If no, skip the remainder of this section.

2. Have these wastes been placed for treatment ? ☐ Yes ☐ No

A. If yes, describe treatments processes below:

3. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both ? ☐ Yes ☐ No

4. Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements, and the waste analysis plan to the Agency ? ☐ Yes ☐ No

5. Have minimum technology requirements been met ? ☐ Yes ☐ No

A. If no, have waivers been granted for each restricted waste management unit ? ☐ Yes ☐ No

6. Have all 264/265 Subpart F groundwater monitoring requirements been met ? ☐ Yes ☐ No

Facility Name: GATX
EPA Id Number: TX0026481523

Form B - Treatment, Storage and Disposal (cont'd) *N/A*

7. Have representative samples of sludge and supernatant from applicable surface impoundments been tested adequately and in accordance with sampling frequency and analysis specified in the waste analysis plan? ☐ Yes ☐ No
- A. Are test results maintained in the operating record? ☐ Yes ☐ No
- B. Did hazardous waste residues (i.e. sludge or liquid) exceed treatment standards as specified in 268.41? ☐ Yes ☐ No
- C. Provide the frequency of analyses conducted on treatment residues below:
- _____
- _____
- _____
- D. Do operating records adequately document results of waste analyses performed in accordance with 268.41? ☐ Yes ☐ No
8. Has supernatant been determined to exceed treatment standards? ☐ Yes ☐ No
- A. If yes, is annual throughput greater than surface impoundment volume? ☐ Yes ☐ No
9. If residues were removed annually, have adequate precautions been taken to protect liners and do records indicate that inspections of liner integrity are performed? ☐ Yes ☐ No
10. When removed, were solvent wastes managed subsequently in another surface impoundment? ☐ Yes ☐ No
11. When removed, were wastes treated prior to disposal? ☐ Yes ☐ No
- A. If yes, are waste residues treated onsite or offsite? _____
- B. Describe management method below:
- _____
- _____
- _____

Facility Name: GATX
EPA Id Number: TX 0026481523

Form B - Treatment, Storage and Disposal (cont'd)

N/A

Section IV. RCRA-regulated Treatment (not including surface impoundments)

1. Did the facility operate treatment facilities for restricted wastes? ☐ Yes ☐ No

If no, skip the rest of Section IV.

2. Describe processes for each restricted waste treated onsite:

3. Does the facility treat soft hammer wastes? ☐ Yes ☐ No

If yes,

- A. Is treatment occurring as described in the facility's certification/demonstration? ☐ Yes ☐ No

- B. Did the treatment facility certify all soft hammer waste as per the facility's demonstration and maintain copies of all certifications? ☐ Yes ☐ No

- C. Did the facility send a copy of the demonstration and certification to the receiving treatment, recovery, or storage facility? ☐ Yes ☐ No

4. Does the treatment facility test the treatment residuals in accordance with an acceptable waste analysis plan? ☐ Yes ☐ No

5. Do treatment residuals exceed treatment standards? ☐ Yes ☐ No

If yes,

- A. Describe processes used to handle those residuals?

- B. Describe the frequency of testing of treatment residuals below:

6. Was dilution used as a substitute for treatment? ☐ Yes ☐ No

Facility Name: G/ATX
EPA Id Number: TXD026481523

Form B - Treatment, Storage and Disposal (cont'd)

N/A

7. Are certifications and results of waste analyses kept in the operating record ? ☐ Yes ☐ No

If any treatment residuals were shipped offsite for further treatment or disposal, complete Form C - Manifesting Restricted Wastes.

Section V. Land Disposal

1. Were restricted wastes placed in land disposal units (i.e. surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers) for other than treatment purposes ? ☐ Yes ☐ No
2. Did the facility have appropriate notices or certifications from generators or treatment facilities in its operating record [268.7(a-b)] ? ☐ Yes ☐ No
3. Did the facility obtain waste analyses of restricted wastes to determine if such wastes were in compliance with applicable treatment standards [268.7(c)] ? ☐ Yes ☐ No
4. Were restricted wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units excluding national capacity variances ? ☐ Yes ☐ No

If yes,

- A. Did the facility have an approved waiver based on "no migration" petition, approved case-by-case, capacity extension, or treatment standard variance ? ☐ Yes ☐ No
5. Were restricted wastes, subject to national or case-by-case capacity variances or extensions, disposed ? ☐ Yes ☐ No

If yes,

- A. Were these wastes disposed of in a hazardous waste management unit that meets minimum technology requirements ? ☐ Yes ☐ No
6. Are adequate records of disposal maintained ? ☐ Yes ☐ No

Facility Name: GATK
EPA Id Number: TXD026481523

Form B - Treatment, Storage and Disposal (cont'd)

N/A

7. If wastes subject to nationwide variances, case-by-case extensions, or no migration petitions were disposed, does the facility have notices and records of disposal? ☐ Yes ☐ No
8. If the facility has a case-by-case extension, is there data available to verify that the facility is making progress as described in progress reports? ☐ Yes ☐ No
9. If the facility is disposing of a soft hammer waste, are notices or certifications maintained onsite? ☐ Yes ☐ No

If yes,

- A. Could any of these wastes be classified as California List wastes? ☐ Yes ☐ No
- B. Did the facility seek to verify whether these wastes are subject to all restrictions? ☐ Yes ☐ No

Facility Name: GATX
EPA Id Number: TXD026481523

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form C - Manifesting Restricted Wastes

Note: This form should be completed only if the generator or handler ships restricted waste offsite for treatment or disposal. The following requirements may also apply to treatment facilities (including incinerators) which ship residues, still bottoms, or ash offsite for additional treatment or disposal.

1. If restricted wastes which exceed treatment standards, and are not subject to case-by-case extensions, "no migration" exemption, or nationwide variance, did the generator or handler provide the following information along with each hazardous waste manifest during shipment:

- A. Manifest document number ? ☒ Yes ☐ No
B. EPA waste identification code ? ☒ Yes ☐ No
C. Treatment standards for each restricted waste ? ☐ Yes ☒ No
D. Waste analysis data (if available) ? ☒ Yes ☐ No
E. All applicable restrictions ? ☒ Yes ☐ No

Notice: Restricted wastes which exceed treatment standards may only be sent for treatment (including incineration). Such wastes are prohibited from land disposal, unless there is a variance or extension applicable to the waste.

2. Identify all offsite treatment facilities accepting wastes exceeding treatment standards:

Rollins Environmental Services, Inc.
New Port, Texas

3. If restricted wastes do not exceed treatment standards, are subject to case-by-case extension, have a "no migration" exemption, or a nationwide variance, did the generator or handler provide the following information along with each hazardous waste manifest during shipment:

- A. Manifest document number ? ☐ Yes ☐ No

Facility Name: GATR
EPA Id Number: TRD026481523

Form C - Manifesting Restricted Wastes (cont'd)

- B. EPA waste identification code ? ☐ Yes ☐ No
- C. Treatment standards for each restricted waste ? ☐ Yes ☐ No
- D. Waste analysis data (if available) ? ☐ Yes ☐ No
- E. All applicable restrictions ? ☐ Yes ☐ No
- F. Date the wastes are subject to restrictions ? ☐ Yes ☐ No
- G. The following certification ? ☐ Yes ☐ No

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of imprisonment.

Notice: The above certification statement must be signed by an authorized representative of the facility.

4. Identify all offsite treatment or disposal facilities accepting wastes below treatment standards:

5. If waste is subject to a nationwide variance (e.g. solvent-water mixtures less than 1%), extension or petition has the facility provided notice to disposers that waste is exempt from land disposal restrictions ? ☐ Yes ☒ No
6. Does the generator or handler keep records of all notifications or certifications for waste sent to offsite facilities after August 16, 1988 ? ☐ Yes ☒ No

Facility Name: GATX
EPA Id Number: TX0026481523

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

N/A

Form D - Testing and Management of F-solvents and Dioxins

Note: This form should be completed only if the facility generates or handles F-solvents or Dioxin wastes regardless of concentrations.

-
1. Has the facility correctly determined the appropriate treatability group [268.41] for F-solvents generated or handled onsite (see Appendix A) ? ___ Yes ___ No
2. Has the facility determined whether F-solvent wastes exceed treatment standards based on the following:
- A. Knowledge of process ? ___ Yes ___ No
- i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:
- _____

- B. Toxicity Characteristic Leaching Process (TCLP) ? ___ Yes ___ No
- i. If yes, provide the following information:
- a. Last test date: _____
- b. Frequency of testing: _____
- c. Indicate any problems with testing procedure below:
- _____

- ii. Attach test results to report.
- iii. Were wastes tested using TCLP when processes or wastestreams changed ? ___ Yes ___ No
- iv. Was testing done prior to dilution or solidification ? ___ Yes ___ No
- C. Other (specify): _____
3. Did F-solvent wastes exceed their applicable treatment standards upon generation [268.7(a)(2)] ? ___ Yes ___ No

Facility Name: GATX
EPA Id Number: TXD026487523

Form D - Testing and Management of F-solvents and Dioxins (cont'd) *N/A*

4. Did the facility dilute the waste or treatment residuals as a substitute for adequate treatment [268.3] ? ☐ Yes ☐ No
5. Were treatment residuals generated from 264/265 RCRA-exempt units or processes ? ☐ Yes ☐ No

If yes,

- A. List the type(s) of treatment and unit(s) below:

Note: If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.

6. Have F-solvents or dioxin wastes been stored for greater than 90 days ? ☐ Yes ☐ No
- If yes,
- A. Is facility operating under interim status or final permit ? ☐ Yes ☐ No

If the answer was yes for either 6 or 6A, complete Form B - Treatment, Storage and Disposal.

Facility Name: GATX
EPA Id Number: TXD026481523

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

N/A

Form E - Testing and Management of California List Wastes

Note: This form should be completed only if the facility generates or handles California List wastes at the concentrations listed in Form A - Restricted Waste Determination.

1. Has the facility conducted any testing of restricted wastes to determine whether the concentrations qualify them as California Wastes ? Yes No

If no,

Has the facility retained records documenting that the waste is not restricted under the California List by knowledge of process ? Yes No

2. Has the Paint Filter Liquids Test (PFLT) been performed as described by SW-846 to determine whether California List wastes (except halogenated organic compounds) are in liquid form ? Yes No

3. If wastes have been determined to be in liquid form, were these wastes solidified using an absorbent ? Yes No

A. If yes, note type of absorbent used: _____

B. Indicate which wastes were solidified by absorbent below:

Check each box that applies:

☐ Liquid hazardous wastes or liquids associated with solids or sludges containing free cyanides at concentration greater than 1000 mg/L.

☐ Liquid hazardous wastes or liquids associated with solids or sludges containing one or more of the following concentrations:

☐ Arsenic or compounds containing arsenic greater than 500 mg/L;

☐ Cadmium or compounds containing cadmium greater than 100 mg/L;

☐ Chromium or compounds containing chromium greater than 500 mg/L;

☐ Lead or compounds containing lead greater than 500 mg/L;

Facility Name: GATX
EPA Id Number: TX0026481523

Form E - Testing and Management of California List Wastes (cont'd) N/A

- ☐ Mercury or compounds containing mercury greater than 20 mg/L;
- ☐ Nickel or compounds containing nickel greater than 134 mg/L;
- ☐ Selenium or compounds containing selenium greater than 100 mg/L; or
- ☐ Thallium or compounds containing Thallium greater than 130 mg/L.

- ☐ Liquid hazardous wastes exhibiting a pH less than or equal to 2.0.
- ☐ Liquid hazardous wastes that also contain polychlorinated biphenols (PCBs) at concentrations between 50 to 500 mg/L.
- ☐ Liquid or nonliquid hazardous waste containing halogenated organic compounds at concentrations greater than or equal to 1000 mg/Kg.

4. Has the facility determined whether concentration levels of the analytes (not extracts or filtrates) equal or exceed prohibition levels or whether the pH of the wastes is less than or equal to 2.0 based on:

A. Knowledge of process ? Yes No

i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:

B. Testing ? Yes No

i. Did the facility determine if concentration levels in PFLT extracts exceed cyanide or metal treatment standards ? Yes No

ii. List the test methods used: _____

iii. List constituents and respective concentration levels for wastes found to exceed prohibition levels below:

Facility Name: GATE
EPA Id Number: TRD026481523

Form E - Testing and Management of California List Wastes (cont'd) *N/A*

5. Has the facility treated waste onsite or offsite: _____

A. If onsite, complete Form B - Treatment, Storage, and Disposal.

B. If offsite, complete Form C - Manifesting Restricted Wastes.

Facility Name: GATX
EPA Id Number: TKD026481523

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form F - Testing and Management of "First Third" Wastes

Note: This form should be completed only if the facility generates or handles wastes restricted under the "First Third" list (August 17, 1988).

I. Hard Hammer Provisions

1. Has the facility correctly determined the appropriate treatability group for hard hammer wastes generated or handled onsite ? ☒ Yes ☐ No

2. Has the facility determined whether hard hammer wastes exceed treatment standards based on the following:

A. Knowledge of process ? ☒ Yes ☐ No

i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:

B. Toxicity Characteristic Leaching Process (TCLP) ? ☐ Yes ☐ No

i. If yes, provide the following information:

a. Last test date: _____

b. Frequency of testing: _____

c. Indicate any problems with testing procedure below:

ii. Attach test results to report.

iii. Were wastes tested using TCLP when processes or wastestreams changed ? ☐ Yes ☐ No

iv. Was testing done prior to dilution or solidification ? ☐ Yes ☐ No

Facility Name: GATK
EPA Id Number: TXD026481523

Form F - Testing and Management of "First Third" Wastes

C. Other (specify): _____

3. Did the hard hammer wastes exceed their applicable treatment standards upon generation [268.7(a)(2)] ? ☒ Yes ☐ No

4. Is there any reason to believe that the facility may have diluted these wastes to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling, etc.) ? ☐ Yes ☒ No

5. Did the facility ascertain whether hard hammer wastes were appropriately assigned wastewater on non-wastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) ? ☒ Yes ☐ No

6. Does the facility handle K061 wastes ? ☐ Yes ☒ No

If yes,

A. Were nonwastewaters appropriately classified in either the high or low zinc subcategories (> 15% Zn) ? ☒ Yes ☐ No

7. Does the facility handle K101 or K102 wastes ? ☐ Yes ☒ No

If yes,

A. Were nonwastewaters appropriately classified in either the high or low arsenic subcategories ? ☐ Yes ☐ No

8. Have hard hammer wastes been stored for greater than 90 days ? ☐ Yes ☒ No

If yes,

A. is facility operating under interim status or final permit ? ☐ Yes ☐ No

If the answer was yes for either 8 or 8A, complete Form B - Treatment, Storage and Disposal.

Facility Name: GARY
EPA Id Number: TXD 026981523

Form F - Testing and Management of "First Third" Wastes

II. Soft Hammer Provisions

1. Has the facility submitted demonstrations and certifications for each soft hammer waste destined for disposal in landfills or surface impoundments to the Regional Administrator prior to the shipment of the waste to the disposal facility ? ☒ Yes ☐ No

If yes,

- i. Has the facility retained a copy of each demonstration onsite ? ☐ Yes ☐ No
- ii. Has the facility retained copies of all certifications sent to the disposal facility ? ☐ Yes ☐ No
2. Has the facility sent copies and kept copies of the following information with each shipment of soft hammer wastes:
- A. Manifest document number ? ☒ Yes ☐ No
- B. EPA waste identification code ? ☒ Yes ☐ No
- C. All applicable restrictions ? ☒ Yes ☐ No
- D. Waste analysis data (if available) ? ☒ Yes ☐ No
- E. Applicable certifications ? ☒ Yes ☐ No
3. Do facility records indicate that soft hammer wastes are destined for disposal in landfills or surface impoundments ? ☐ Yes ☒ No

If yes,

- A. List the name of the waste(s) destined for disposal:

- B. Name the facility where the waste is destined:

Facility Name: GATX
EPA Id Number: TXD026481523

Form F - Testing and Management of "First Third" Wastes

4. Have soft hammer wastes been stored for greater than 90 days ? ☐ Yes ☒ No
- A. If yes, is facility operating under interim status or final permit ? ☐ Yes ☐ No

If the answer was yes for either 4 or 4A, complete Form B - Treatment, Storage and Disposal.



GATX TERMINALS CORPORATION

906 CLINTON DRIVE
P.O. BOX 486
GALENA PARK, TX 77547-0486
713-455-1231

August 14, 1989

Regional Administrator
United States Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Re: Section 268.8(a)(2)(ii) -- Demonstration and Certification

Dear Sir:

This demonstration and certification is submitted pursuant to 40 CFR 268.8(a)(2)(ii).

It is submitted in connection with a hazardous waste stream generated at this site:

GATX Terminals
P. O. Box 486
Galena Park, TX 77547

U.S. E.P.A. Generator No.: TXD026481523
U.S. Waste Code: U051
Texas Registration No.: 30573
Texas Waste Code: 978980
Rollins HO#: HO-26843-20/23

The stream is classified as a soft hammer waste. Pursuant to Section 268.8 we have made an effort to locate treatment or recovery facilities which provide the greatest environmental benefit. And, since treatment is available, GATX contracted with Rollins Environmental Services for incineration. Incineration in a RCRA-permitted incinerator, which destroys the hazardous constituents, is the best treatment that is practically available. Additionally, Appendix A is a list of other facilities contacted for treatment or recovery.

Therefore, I certify under penalty of law that the requirements of 40 CFR 268.8 (a)(1) have been met and that I have contracted to treat my waste by the practically available greatest environmental benefit, as indicated in my demonstration. I believe the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,

Lynn R. Jones
Environmental Engineer

LRJ/nro

cc: R. E. Butler
R. L. Commander
File



APPENDIX A

FACILITIES CONTACTED FOR TREATMENT OR RECOVERY

Facility Contacted:	ENSCO
Facility Official Contacted:	Martin Wernick
Address:	333 Executive Court Little Rock, Arkansas 72205
Telephone:	(405) 329-6782
Technology:	Incineration
Facility Contacted:	Chemical Waste Management
Facility Official Contacted:	Kenneth Koehen
Address:	515 West Green Road, Suite 400 Houston, Texas 77067
Telephone:	(713) 875-1110
Technology:	Incineration

GATX

Brown
GATX TERMINALS CORPORATION

AMERICAN PETROLEUM INSTITUTE
1221 AVENUE OF THE AMERICANS
NEW YORK, N.Y. 10020-1292
713/354-1234

August 10, 1989

Regional Administrator
United States Environmental Protection Agency
Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202

Re: Section 268.8(a)(2)(ii) -- Demonstration and Certification

Dear Sir:

This demonstration and certification is submitted pursuant to 40 CFR 268.8(a)(2)(ii).

It is submitted in connection with a hazardous waste stream generated at this site:

GATX Terminals
P. O. Box 486
Galena Park, TX 77547

U.S. E.P.A. Generator No.: TXD026481523
U.S. Waste Code: D001, U165, U105, U069, U028,
U050, U107, U022
Texas Registration No.: 30573
Texas Waste Code: 981510
Rollins HO#: HO-22428-24/20

The stream is classified as a soft hammer waste. Pursuant to Section 268.8 we have made an effort to locate treatment or recovery facilities which provide the greatest environmental benefit. And, since treatment is available, GATX contracted with Rollins Environmental Services for incineration. Incineration in a RCRA-permitted incinerator, which destroys the hazardous constituents, is the best treatment that is practically available. Additionally, Appendix A is a list of other facilities contacted for treatment or recovery.

Therefore, I certify under penalty of law that the requirements of 40 CFR 268.8 (a)(1) have been met and that I have contracted to treat my waste by the practically available greatest environmental benefit, as indicated in my demonstration. I believe the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,

Lynn R. Jones

Lynn R. Jones
Environmental Engineer

LRJ/nro

cc: R. E. Butler
R. L. Commander
File



APPENDIX A

FACILITIES CONTACTED FOR TREATMENT OR RECOVERY

Facility Contacted:	ENSCO
Facility Official Contacted:	Martin Wernick
Address:	333 Executive Court Little Rock, Arkansas 72205
Telephone:	(405) 329-6782
Technology:	Incineration
Facility Contacted:	Chemical Waste Management
Facility Official Contacted:	Kenneth Koehen
Address:	515 West Green Road, Suite 400 Houston, Texas 77067
Telephone:	(713) 875-1110
Technology:	Incineration

✓

1.1

EPA

TEXAS WATER COMMISSION

B. J. Wynne, III, Chairman
Paul Hopkins, Commissioner
John O. Houchins, Commissioner



Allen Beinke, Executive Director
Michael E. Field, General Counsel
Brenda W. Foster, Chief Clerk

August 7, 1989

TXD026481523

Mr. Kyle J. Mullins
Manager Environmental Affairs
Southern Region
GATX Terminals Corporation
400 North Belt East, Suite 700
Houston, Texas 77060

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: GATX Terminals Corporation
Solid Waste Registration No. 30573
Notice of Solid Waste Violations

Dear Mr. Mullins:

On April 15, and May 9, 1989, Texas Water Commission (TWC) representatives from the District 7 Deer Park area office conducted a solid waste inspection and a Comprehensive Groundwater Monitoring Evaluation (CME) of the above noted facility in order to survey compliance of the operation with the Commission's rules pertaining to solid waste management. During the inspection and CME, conditions were observed and documented that we believe may constitute violations of the solid waste rules.

The following areas of alleged noncompliance were observed during the inspection:

1. 31 TAC §335.6 - Notification Requirements. GATX has failed to notify the Executive Director in writing of the following changes to the company's Notice of Registration:

- a) The current company contact should be updated;
- b) GATX had notified as a Small Quantity Generator. However, the company generates hazardous waste in excess of 1000 Kg per month;
- c) The generation of purge and recovery groundwater

associated with the groundwater recovery program for the Southeast Holding Basin should be added to the registration; and

d) The storage of purge and recovery groundwater at a container storage area should be added to the registration.

2. 31 TAC §335.2 and §335.43 - Permit Required. GATX failed to receive authorization from the Texas Water Commission for disposing of hazardous wastes at the North Holding Basin. Analytical results for sediment samples collected from the basin by the TWC on November 10, 1987 indicates that the North Holding Basin contains hazardous sludges. The North Holding Basin became inactive on November 7, 1988.

GATX must comply with the following state solid waste requirements to fulfill closure and post-closure requirements for the North Holding Basin: a) 31 TAC §335.7 - Bond or Other Financial Assurance Required; and b) 31 TAC §335.8 - Closure - This requirement includes all applicable provisions relating to closure and post-closure in Subchapter F of 31 TAC Chapter 335.

During a TWC-GATX facts meeting of May 17, 1989, company representatives indicated that the North Holding Basin would be closed as a hazardous waste landfill. As a result, GATX is required to obtain a post-closure care permit for the North Holding Basin. The company was also informed that post closure care is also required for the closed Southeast Holding Basin.

3. 31 TAC §335.4 and Section 26.121 of the Texas Water Code - General Prohibitions. Heavily stained soils were observed near the truck and tank car loading/unloading Station No. 4 and the adjacent manifold. Heavily stained soils were also observed around Tank 29 and the adjacent oil/water separator.

4. 31 TAC §335.69(a)(4) - Accumulation Time Requirements. GATX does not have documents at the facility recording the job title and description for each position related to hazardous waste management and the type and amount of training required for each position. In addition, GATX has not updated the Contingency Plan to show a current employee of the facility as Emergency Coordinator.

5. 31 TAC §335.112(a)(6) - Post-Closure Plan. The post-closure plan for the South Holding Basin does not indicate the number of years for which post-closure care will be provided.

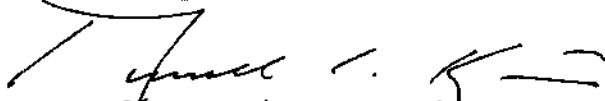
In response to these alleged noncompliances, the TWC is instituting Enforcement Action, including administrative penalties not to exceed \$10,000 per day. Accordingly, you are being advised so that you can make an appropriate response to each noncompliance.

We offer you the opportunity to arrange for a meeting in our Austin office to discuss the facts related to these allegations, to be

Mr. Kyle J. Mullins
Page 3

held within two weeks from the date of this letter. If you have any questions concerning these matters, please contact Allan Posnick of the Hazardous and Solid Waste Enforcement Section at (512) 463-8425.

Sincerely,

A handwritten signature in dark ink, appearing to read "Russell S. Kimble", with a stylized flourish at the end.

Russell S. Kimble, Chief
Hazardous and Solid Waste Enforcement Section
Hazardous and Solid Waste Division

AP/ap

cc: TWC District 7 Deer Park office
Cheryl Wilson, Reports and Information Management
Michelle McFaddin, Legal Division
Alan Petrov, Legal Division